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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION

LISA LIBERI, *et al.*

Plaintiffs,

vs.

ORLY TAITZ, *et al.*

Defendants.

Case No. 8:11-CV-00485-AG (AJW)
Hon. Andrew Guilford
Courtroom 10D

**EVIDENTIARY OBJECTIONS BY
DEFENDANT, ORLY TAITZ, TO
DECLARATIONS FILED BY
PLAINTIFFS WITH THEIR
OPPOSITION TO DEFENDANT'S
MOTION TO DISMISS PURSUANT
TO FRCP 12(b)(6)**

Date: August 22, 2011
Time: 10:00 a.m.
Place: Courtroom 10D

Date Action Filed: May 4, 2009
Discovery Cut-Off: March 5, 2012
Final Pre-Trial Conf.: May 21, 2012
Trial Date: June 5, 2012

**TO THE COURT, ALL PARTIES, AND/OR THEIR ATTORNEYS OF
RECORD:**

COMES NOW, Defendant, ORLY TAITZ (“Moving Defendant”), who
submits the following evidentiary objections to, and moves to strike, the
Declarations of Plaintiffs, LISA LIBERI and LISA OSTELLA, as well as the
Declaration of Charles Edward Lincoln, III, and all other extrinsic evidence,

1 submitted with Plaintiffs' Opposition to Moving Defendant's Motion to Dismiss
2 pursuant to FRCP 12(b)(6). This Memorandum is submitted in reply to Plaintiffs'
3 opposition to Moving Defendant's subject Motion.

4 **I. GENERAL OBJECTIONS TO CONSIDERATION OF PLAINTIFFS'**
5 **AND CHARLES EDWARD LINCOLN III'S DECLARATIONS AND**
6 **RELATED EXHIBITS REGARDING MOVING DEFENDANTS' FRCP**
7 **RULE 12(b)(6) MOTION TO DISMISS**

8 Moving Defendant has filed an FRCP Rule 12(b)(6) Motion to dismiss
9 Plaintiffs' First Amended Complaint ("FAC"). She has not filed a Motion for
10 summary judgment. Moving Defendant's Motion to dismiss challenges the legal
11 sufficiency of the FAC, based on its allegations shown on the "face" of the
12 pleading. She does not rely on, nor submit evidence of, any matter extrinsic to the
13 FAC.

14 Plaintiffs - tacitly conceding the insufficiency of the FAC's allegations - in
15 opposition to such Motion submit three lengthy declarations from Plaintiffs LIBERI
16 and OSTELLA and non-party, Mr. Lincoln (a former attorney disbarred in Texas
17 and California), as well as voluminous exhibits consisting of approximately 270
18 pages.

19 Instead of arguing the legal sufficiency of the FAC in their opposition,
20 Plaintiffs in such declarations apparently hope to prove some vague and confusing
21 claim having little or no relation to what is actually pled in the FAC. There is a
22 complete "disconnect" between what is pled in the FAC and the unintelligible
23 contentions raised in such declarations; Plaintiffs fail to link any contention raised
24 in such declarations to any claim for relief pled in the FAC.

25 Moreover, as a matter of law, Plaintiffs' and Mr. Lincoln's declarations and
26 their related exhibits cannot be considered on Moving Defendants' FRCP Rule
27 12(b)(6) Motion to dismiss the FAC. Such Motion is limited to the "face" of the
28 FAC and matters judicially noticed. FRCP Rule 12(b)(6). Bell Atlantic Corp. v.

Twombly, 550 U.S. 544, 563 (2007). Szoke v. Carter, 165 F.R.D. 34, 36 (S.D.N.Y. 1996). Graehling v. Village of Lombard, 58 F.3d 295, 298 (7th Cir. 1995). Monroe v Cessna Aircraft Co., 417 F.Supp.2d 824, 827.

Moving Defendant therefore objects to Plaintiffs' and Mr. Lincoln's declarations and their related exhibits being considered in opposition to her Motion to dismiss. Moving Defendant moves to strike such improper extrinsic evidence.

II. SPECIFIC OBJECTIONS TO PLAINTIFFS' AND CHARLES EDWARD LINCOLN III'S DECLARATIONS AND RELATED EXHIBITS

As stated, Plaintiffs' and Mr. Lincoln's declarations and their related exhibits cannot be considered herein. However, *if* the Court does consider such matters, Moving Defendant submits the following specific evidentiary objections to them. Such objections are submitted with an express reservation of Moving Defendant's general objections to Plaintiffs' and Mr. Lincoln's declarations and their related exhibits being considered, and without waiving such general objections. As shown below, such declarations are devoid of any competent or admissible evidence.

A. Objections to Declaration of Plaintiff, Lisa Liberi

EVIDENTIARY OBJECTIONS

DECLARATION OF PLAINTIFF, LISA LIBERI	MOVING DEFENDANT'S OBJECTIONS	COURT'S RULING
1. "I filed suit against Ms. Taitz and the other Defendants as a result of the illegal background check conducted on me; the illegal access of my credit reports; the illegal disclosure of	Irrelevant. Fed. R. Evid. ("FRE"), Rules 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602.	Sustained: ____ Overruled: ____

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	my full Social Security number, date of birth, place of birth, mother's maiden name, father's name, home address, telephone number, the harassment of my friends and family, and Ms. Taitz's disclosure of my private details to John Mark Allen, my son's father who my son and I were provided protection from as a result of the crimes committed against us. Ms. Taitz continues twisting the reasons Plaintiffs filed suit and continues misstating the truth. All of which Orly Taitz has admitted in her Motion to Dismiss filed on behalf of Defend our Freedoms Foundations, Inc., Docket No. 283." Declaration of Lisa Liberi,¶ 1.	Hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged "illegal" acts. Argumentative.	
22 23 24 25 26 27 28	2. "Orly Taitz has threatened me several times. Orly Taitz stated she was going to destroy me and get rid of me, which Orly Taitz has admitted in her Court filings. Orly Taitz has put out on the	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level	Sustained: ____ Overruled: ____

<p>Internet on her website that I needed to be “gotten” rid of; and other threats. Not only has Orly Taitz made these direct threats, she has also implied her intentions and threats with all her postings, her statements, her circulation of my pictures and home address, sending my private details along with my pictures to white supremacy groups, hate groups, armed militia groups, posting about me on average every two (2) to three (3) days for the past 2-1/2 years, calling for her supporters in Santa Fe, New Mexico where I reside to assist her regarding me, etc.” Declaration of Lisa Liberi, ¶ 2.</p>	<p>hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged “threats.” Argumentative.</p>	
<p>3. Orly Taitz has been asked to stop, Orly Taitz has been served with all pleadings in this case, she has all transcripts of all hearings, Orly Taitz is well aware her actions have put me in fear of my life and fear for the</p>	<p>Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay. FRE 802 et seq. Vague and ambiguous.</p>	<p>Sustained: ____ Overruled: ____</p>

1 2 3 4 5 6 7	lives of my son and husband, regardless, Orly Taitz has continued her actions.” Declaration of Lisa Liberi, ¶ 3.	Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged acts. Argumentative.	
8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	4. “Orly Taitz is aware I have heart complications, she understands what this means as she has repeatedly stated she is a doctor, a dentist and a lawyer. Orly Taitz is also aware of the complications her harassment has caused me, the hospitalizations, etc. Regardless of this, Orly Taitz has continued her behaviors.” Declaration of Lisa Liberi, ¶ 4.	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged “harassment.” Argumentative.	Sustained: ____ Overruled: ____
23 24 25 26 27 28	5. “I watch Orly Taitz website at www.oryltaitzesq.com as do witnesses of ours for Orly Taitz’s postings. All of Orly Taitz’s postings on file with this Court I have obtained, as well as other	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay. FRE 802 et seq.	Sustained: ____ Overruled: ____

<p>1 individuals, directly from Orly 2 Taitz's website by going to 3 http://www.orlytaitzesq.com. I 4 then print them to PDF format 5 and maintain a hard copy." 6 Declaration of Lisa Liberi, ¶ 5.</p>	<p>Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.</p>	
<p>7 6. "Orly Taitz was sending out 8 her libel statements with my 9 confidential private identifying 10 information, including my family 11 picture and a picture of me which 12 Orly Taitz claims is a "mug 13 shot", from her dental office as a 14 Dentist, Doctor and Attorney to 15 give her statements credibility. 16 In fact, Orly Taitz gave her 17 dental office phone number at the 18 bottom of her emails with this 19 information as can be seen in the 20 exhibits filed May 20, 2011, 21 particularly Exhibit #14, see also 22 EXHIBIT "1" attached hereto. 23 As can be seen by Exhibit "1" 24 attached, Orly Taitz sent Dossier 25 #6 out via email from her yahoo 26 email address, the email is signed 27 "Orly Taitz, DDS, Esq" and</p>	<p>Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged "libel statements" and other alleged acts. Argumentative. Lack of authentication and identification of exhibit. FRE 901 et seq.</p>	<p>Sustained: ____ Overruled: ____</p>

1 provides her dental office phone		
2 number of (949) 586-8110.”		
3 Declaration of Lisa Liberi,¶ 6.		
4 7. Ms Taitz continues stating I	Irrelevant. FRE 401, 402.	Sustained: ____
5 am a career document forger and	Speculation. Lacks	Overruled: ____
6 that I have a criminal record	foundation. No showing of	
7 going back to the 1990's. This is	personal knowledge of	
8 not true, I do not have criminal	declarant. FRE 602.	
9 record going back to the 1990's	Hearsay, and multiple level	
10 and I have not been convicted of	hearsay. FRE 802 et seq.	
11 forgery of documents or	Vague and ambiguous.	
12 document forgery.” Declaration	Inadmissible opinion	
13 of Lisa Liberi,¶ 7.	testimony. FRE 701 et seq.	
14	Assumes facts not in	
15	evidence, and no	
16	foundation, regarding	
17	alleged statements and	
18	other alleged acts.	
19	Argumentative.	
20 8. “Ms. Taitz knows where I	Irrelevant. FRE 401, 402.	Sustained: ____
21 reside as she put my home	Speculation. Lacks	Overruled: ____
22 address out all over the Internet	foundation. No showing of	
23 and filed it with this Court on	personal knowledge of	
24 July 29, 2010. In fact, a	declarant. FRE 602.	
25 dangerous criminal, Ruben	Hearsay. FRE 802 et seq.	
26 Nieto, who attempted to get paid	Vague and ambiguous.	
27 by Ms. Taitz, lives in	Inadmissible opinion	
28		

1 2 3 4 5	Albuquerque, New Mexico, forty-five minutes away from my house.” Declaration of Lisa Liberi,¶ 8.	testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding Mr. Nieto. Argumentative.	
6 7 8 9 10 11 12 13 14 15	9. “Ms. Ostella was set-up as Ms. Taitz’s customer contact in Ms. Taitz’s PayPal account. This did not give Ms. Ostella access to Ms. Taitz accounts, but instead it carbon copied Ms. Ostella’s email address for PayPal payment requests from Ms. Taitz’s PayPal account.” Declaration of Lisa Liberi,¶ 9.	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	Sustained: ____ Overruled: ____
16 17 18 19 20 21 22 23 24 25 26 27 28	10. “Further, Ms. Taitz has harassed every governmental agency in New Mexico to the point they called in the NM Attorney General to put a stop to Ms. Taitz harassing and illegal behaviors.” Declaration of Lisa Liberi,¶ 10.	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding	Sustained: ____ Overruled: ____

	alleged “harassing and illegal behaviors.” Argumentative.	
11. “Moreover, Ms. Taitz called on her readers, followers and supporters to contact the law enforcement agency where I reside, she continued calling on them to further cyber-stalk; cyber-harass; and cyber-bully me, which they did.” Declaration of Lisa Liberi, ¶ 11.	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged harassment. Argumentative.	Sustained: ____ Overruled: ____
12. “I have received nonstop phone calls stating I am going to meet my maker real soon if I don’t drop this lawsuit against Ms. Taitz. I have had strange individuals show up at my home, peeking in my windows, scrambling my phones, all after Ms. Taitz publication of my home address and telephone	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq.	Sustained: ____ Overruled: ____

1 2 3 4 5	number.” Declaration of Lisa Liberi,¶ 12.	Assumes facts not in evidence, and no foundation, regarding alleged “publication.” Argumentative.	
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27	13. “My local law enforcement has been forced to take reports for stalking, Cyber-stalking, Cyber-harassment, Cyper-bullying; fraud; forgery; identity theft; threats, where they have listed the prime suspect as Orly Taitz. This is a result of all of Orly Taitz publishing and continued republishing of her threats against me, her calling for her supporters for help regarding me; and her continued publichisng of my full Social Security number, my maiden name, my mother’s maiden name, my father’s name, my home address, my place of birth, my date of birth and my husband’s primary identification information. As a result, my husband and my identities have	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged “harassing and illegal behaviors.” Lack of identification of “reports” referred to. FRE 901et seq. Argumentative.	Sustained: ____ Overruled: ____

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1 2 3 4 5 6 7 8 9 10 11 12 13 14	<p>been stolen, our credit has been used repeatedly, accounts have been set-up fraudulently in our names using our identifying information, my credit report show shows me residing in States I have never resided including but not limited to Massachusetts and Iowa. All the law enforcement reports were forwarded to the Federal Bureau of Investigations as the crimes crossed several state lines.”</p> <p>Declaration of Lisa Liberi, ¶ 13.</p>		
15 16 17 18 19 20 21 22 23 24 25 26 27	<p>14. “As a result of Ms. Taitz’s continued harassment, cyber-stalking, cyber-bullying, cyber-harassment, and other illegal acts, I have had to have emergency service from the paramedics numerous times, emergency room visits, cardiac treatments, and hospitalizations due to the complications I suffered with my heart and other medical conditions, resulting from stress induced by Orly Taitz</p>	<p>Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged “harassment” and</p>	<p>Sustained: ____</p> <p>Overruled: ____</p>

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1 2 3 4 5 6	and the other Defendants. This has cost my family in excess of \$250,000.00. My medical bills to date were provided to Judge Robreno on December 20, 2010.” Declaration of Lisa Liberi, ¶ 14.	“illegal acts.” Lack of identification of “medical bills” referred to. FRE 901 et seq. Argumentative.	
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	15. “Ms. Taitz is well aware of what she is doing; she has talked about my medical complications on her radio shows, TV appearances and in her pleadings filed with this Court.” Declaration of Lisa Liberi, ¶ 15.	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged acts. Lack of identification of “pleadings” referred to. FRE 901 et seq. Argumentative.	Sustained: ____ Overruled: ____
25 26 27 28	16. “Ms. Taitz is well aware of the fact I do not and did not at the time suit was original filed in Pennsylvania, May 4, 2009,	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of	Sustained: ____ Overruled: ____

reside in the State of California.
Ms. Taitz has stalked my son, has published trips my son has taken, private details about my son. My son attends school in New Mexico where we reside and Ms. Taitz admitted to this in her statements in her radio appearance on the Andrea Shea-King Radio show which can be found on the Internet at <http://www.blogtalkradio.co/asks-how/2010/08/31/the-andrea-shea-king-show.mp3>. In this Radio program, Ms. Taitz states: "...Against Neil Sankey, a top notch private investigator who was the first one to find all of this information on Social Security numbers...I'm sorry but this woman Lisa Liberi is supposed to be back in prison... And I have provided direction, I have provided the pictures. Here's her picture that came from her boyfriend: 'That's Lisa Liberi, I have a child with her.'"

declarant. FRE 602.
Hearsay, and multiple level hearsay. FRE 802 et seq.
Vague and ambiguous.
Inadmissible opinion testimony. FRE 701 et seq.
Assumes facts not in evidence, and no foundation, regarding alleged stalking and publication. Lack of identification of photographs referred to.
FRE 901et seq.
Argumentative.

1	[Emphasis added].” Declaration		
2	of Lisa Liberi,¶ 16.		
3	17. “As I am sure this Court is	Irrelevant. FRE 401, 402.	Sustained: ____
4	aware, directions can be to a	Speculation. Lacks	Overruled: ____
5	location or it can be to do	foundation. No showing of	
6	something.” Declaration of Lisa	personal knowledge of	
7	Liberi,¶ 17.	declarant. FRE 602.	
8		Hearsay, and multiple level	
9		hearsay. FRE 802 et seq.	
10		Vague and ambiguous.	
11		Inadmissible opinion	
12		testimony. FRE 701 et seq.	
13	18. Ms. Taitz continues in this	Irrelevant. FRE 401, 402.	Sustained: ____
14	radio program falsely accusing	Speculation. Lacks	Overruled: ____
15	me of being a career document	foundation. No showing of	
16	forgery; and then states I accused	personal knowledge of	
17	her of trying to hire a ‘hitman’ to	declarant. FRE 602.	
18	kidnap my son, and the Taitz	Hearsay, and multiple level	
19	asks her audience, did something	hearsay. FRE 802 et seq.	
20	happen to Liberi’s son? I have	Vague and ambiguous.	
21	never claimed Taitz attempted to	Inadmissible opinion	
22	hire a ‘hitman’ or that Ms. Taitz	testimony. FRE 701 et seq.	
23	was going to have my son	Assumes facts not in	
24	kidnapped. Ms. Taitz is the one	evidence, and no	
25	who continually uses ‘hitman’. I	foundation, regarding	
26	have stated that it appears Ms.	alleged hiring of	
27	Taitz has attempted to hire a	“dangerous criminal.”	
28	dangerous criminal to harm Lisa	Argumentative.	

1	Ostella, me and our family's."		
2	Declaration of Lisa Liberi, ¶ 18.		
3	19. "Ms. Taitz threatened to	Irrelevant. FRE 401, 402.	Sustained: ____
4	have Ms. Ostella's children	Speculation. Lacks	Overruled: ____
5	professionally kidnapped. A	foundation. No showing of	
6	man in Albuquerque, NM	personal knowledge of	
7	attempted to get paid by Ms.	declarant. FRE 602.	
8	Taitz in three consecutive money	Hearsay, and multiple level	
9	requests totaling \$25,000.00.	hearsay. FRE 802 et seq.	
10	The requests came in	Vague and ambiguous.	
11	consecutively in the amount of	Inadmissible opinion	
12	\$9,000.00 and two (2) in the	testimony. FRE 701 et seq.	
13	amount of \$8,000.00 totaling	Assumes facts not in	
14	\$25,000.00, as on file with this	evidence, and no	
15	Court. Mr. Nieto requested	foundation, regarding	
16	payment twice, on May 25, 2009	alleged threats and other	
17	and May 29, 2009, in the middle	acts. Lack of identification	
18	of the night. It was bothering to	of "requests" referred to.	
19	see the requests were under the	FRE 901 et seq.	
20	\$10,000.00 reporting amounts	Argumentative.	
21	pursuant to the Patriot Act."		
22	Declaration of Lisa Liberi, ¶ 19.		
23	20. "A spokeo was run on this	Irrelevant. FRE 401, 402.	Sustained: ____
24	man, Ruben Nieto and his email	Speculation. Lacks	Overruled: ____
25	address. Spokeo returned that	foundation. No showing of	
26	Mr. Nieto resided in	personal knowledge of	
27	Albuquerque, NM and provided	declarant. FRE 602.	
28	his birth date. A simple search of	Hearsay, and multiple level	

1 2 3 4 5 6 7 8 9 10 11 12	the NM Judiciary System returned Mr. Nieto's convictions for Aggravated Assault. Further searches confirmed Mr. Nieto was not an Attorney, or a Private Investigator, or a trade which a licensed attorney would hire for permissible purposes. Instead, Mr. Nieto has websites selling porno and marijuana seeds." Declaration of Lisa Liberi, ¶ 20.	hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged threats and other acts. Lack of identification of "searches" referred to. FRE 901 et seq. Argumentative.	
13 14 15 16 17 18 19 20 21 22 23 24 25 26 27	21. "So yes, I do believe Ms. Taitz attempted to hire this an to carry out her threats towards me and Mrs. Ostella, to harm me and my family and harm Mrs. Ostella and her family. Ms. Taitz never disputed that Mr. Nieto's PayPal money requests were not from her PayPal account. I asked Ms. Taitz on December 20, 2010 in Judge Robreno's courtroom if she was saying the PayPal account the money requests from Mr. Nieto was not her PayPal account, and Ms. Taitz answered	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged threats and other acts. Argumentative.	Sustained: ____ Overruled: ____

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1 2 3 4 5 6 7	“NO”, because they were. See the December 20, 2010 Transcript, page 94, lines 7-11, filed on the docket January 14, 2011, appearing as docket entry 162.” Declaration of Lisa Liberi, ¶ 21.		
8 9 10 11 12 13 14 15 16 17 18 19 20 21	22. “Further, anything I confirm regarding my address information with this Court will be placed all over the Internet by Ms. Taitz. For this reason, I will not provide a copy of my driver’s license to Ms. Taitz or even show it to her for that matter.” Declaration of Lisa Liberi, ¶ 22.	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged publication. Argumentative.	Sustained: ____ Overruled: ____
22 23 24 25 26 27 28	23. “Ms. Taitz filed false police reports with Orange County and had them transferred to Santa Fe Police Department claiming Lisa Ostella and I were the same person and that I stole monies from her (Taitz), see EXHIBIT	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq.	Sustained: ____ Overruled: ____

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	<p>“2.” Ms. Taitz was well aware this information was false. In fact, one of the attachments given to the Police Department by Ms. Taitz was her Dossier #6 which contains a PayPal receipt Ms. Taitz claims was stolen, see EXHIBIT “3.” Ms. Taitz statements regarding the missing money was patently false as were her other accusations. Attached hereto as EXHIBIT “4” is Ms. Taitz PayPal Record for her account ending in 4372 obtained by subpoena. The donation referenced in Dossier #6 is showing as received in Ms. Taitz PayPal records, see page .” Declaration of Lisa Liberi, ¶ 23.</p>	<p>Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged “reports” and other acts. Lack of identification of “reports” referred to. FRE 901 et seq. Lack of authentication and identification of exhibits. FRE 901 et seq. Argumentative.</p>	
20 21 22 23 24 25 26 27 28	<p>24. It is obvious and Orly Taitz was well aware that Lisa Ostella and I are not the same person. I reside in New Mexico and Lisa Ostella resides in New Jersey. Lisa Ostella worked for Ms. Taitz for a short period of time, and Ms. Ostella and Ms. Taitz</p>	<p>Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous.</p>	<p>Sustained: ____ Overruled: ____</p>

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	mailed things back and forth to each other. Further, Lisa Ostella and Mrs. Taitz had telephone conversations which required Ms. Taitz to call Lisa Ostella's phone number which is located in New Jersey. In fact, Orly Taitz put out Lisa Ostella's home address and telephone number summoning all her supporters to report Lisa Ostella to the North Brunswick, New Jersey Police Department at the same time Orly Taitz was summoning her supporters to bombard the Sante Fe Probation Department and Sante Fe Police Department regarding me." Declaration of Lisa Liberi, ¶ 24.	Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged "summonsing" and other acts. Argumentative.	
20 21 22 23 24 25 26 27 28	25. "Orly Taitz filed numerous false reports with the Sante Fe Probation Department, all of which were investigated and found to be without merit. When this failed and law enforcement failed, Orly Taitz filed an Emergency Petition in the San	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous.	Sustained: ____ Overruled: ____

<p>1 Bernardino County Superior 2 Court to have my probation 3 revoked. Orly Taitz filed these 4 same false accusations that were 5 filed with the Orange County 6 Sheriff's Department; Santa Fe 7 Police Department; the Santa Fe 8 Probation Department; the San 9 Bernardino County District 10 Attorney's Office and the San 11 Bernardino County Probation 12 office. Except, Orly Taitz 13 included that I tampered with her 14 car, jeopardizing her and her 15 families lives and killed my 16 sister." Declaration of Lisa 17 Liberi, ¶ 25.</p>	<p>Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged "reports" and other acts. Lack of identification of reports and petition referred to. FRE 901 et seq. Argumentative.</p>	
<p>18 26. "This Case had been closed 19 for three (3) years and was 20 reopened due to Orly Taitz's 21 petition. Three (3) court 22 hearings took place, and on each 23 hearing Orly Taitz was 24 publishing it on her website, as 25 filed on May 20, 2011 with this 26 Court, see docket no 190 through 27 190-27, and summoning people</p>	<p>Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq.</p>	<p>Sustained: ____ Overruled: ____</p>

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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	to attend the hearings and be “victims” of “Liberi’s”. I had to have counsel attend the hearings. The Court found absolutely no merit to Orly Taitz, Neil Sankey and Orly Taitz’s supporters false reports, I was found “not guilty” of any violations and the case closed again. All of this was done with malicious intent. Orly Taitz was attempting every way possible to have me falsely accused and jailed because I was and am suing her, which was her ulterior motive.” Declaration of Lisa Liberi, ¶ 26.	Assumes facts not in evidence, and no foundation, regarding alleged “summonsing” and other acts. Argumentative.	
17 18 19 20 21 22 23 24 25 26 27	27. “Orly Taitz was very unhappy so she began seeking her supporters to file formal complaints against the supervising Probation Officers in San Bernardino County. Orly Taitz at this same time also put all over the Internet that I had four (4) active felony charges, knowing this information was false. See Exhibits “125”	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in	Sustained: ____ Overruled: ____

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1 through "128" filed May 20, 2 2011, which I located on Orly 3 Taitz website by going to 4 http://www.oryltaitzesq.com . 5 Again, all of which shows Orly 6 Taitz's malicious intent. 7 Declaration of Lisa Liberi, ¶ 27.	evidence, and no foundation, regarding alleged "seeking her supporters" and other acts. Lack of authentication and identification of exhibits. FRE 901 et seq. Argumentative.	
9 28. "I have never worked for or 10 had anything to do with Orly 11 Taitz. I am not a blogger; I do 12 not and have not posted anything 13 on the Internet, on web forums, 14 on bulletin boards, nowhere on 15 the World Wide Web about Orly 16 Taitz, her company, her family, 17 or anyone she knows. I have 18 never authorized Orly Taitz or 19 any of the other Defendants to 20 publish my private data, obtain 21 and publish my family pictures or 22 single photos, none of which are 23 public, publish my home address 24 or any other information about 25 me. I am not a public person." 26 Declaration of Lisa Liberi, ¶ 28.	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged publication and other acts. Argumentative.	Sustained: ____ Overruled: ____
27 29. "Since the filing of all the 28 Exhibits on May 20, 2011,	Irrelevant. FRE 401, 402. Speculation. Lacks	Sustained: ____ Overruled: ____

29. “Since the filing of all the Exhibits on May 20, 2011, docket number 190 through 190-27, Orly Taitz continued her postings of false information and had the postings posted on websites which Orly Taitz has log-ins and posting privileges with. In fact, www.skypeassholes.com’s postings regarding me were from “Bob Stevens” Orly Taitz’s web person. These other websites “www.skypeassholes.com” and “http://domestickenemies.net” swastika’s; Mossad; Aryan brotherhood; and other armed militia type symbols and have a picture of a gun pointing at you saying “either you are with us or against us”. These two websites also have threatening messages with the posts from Orly Taitz. Orly Taitz posts are outlined below:” Declaration of Lisa Liberi,¶ 29.

foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged “postings” and other acts. Lack of identification of “postings” referred to. FRE 901et seq. Lack of authentication and identification of exhibits. FRE 901et seq. Argumentative.

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	29(a). "June 1, 2011 Orly Taitz posted on her website at http://www.orlytaitzesq.com?qp=22219 "An order from the Judge... I am still waiting for an answer from the Chief judge McKee from the Third Circuit and from the Philadelphia DA and the US attorney re court reporter Dona Anders, who removed from the certified transcript 14 pages in order to benefit Berg and his assistant, convicted document forger... Lisa Liberi" [Emphasis added] see EXHIBIT "5"." Declaration of Lisa Liberi,¶ 29(a).	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged "posting" and other acts. Lack of authentication and identification of exhibit. FRE 901 et seq. Argumentative.	Sustained: ____ Overruled: ____
19 20 21 22 23 24 25 26 27 28	29(b). June 10, 2011 Orly Taitz posted on her website at http://www.orlytaitzesq.com?qp=22624 "Latest opposition regarding Philip Berg and his assistant, convicted document forger...Lisa Liberi", [emphasis added] see EXHIBIT "6"." ///	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion	Sustained: ____ Overruled: ____

1 2 3 4 5 6 7 8 9	Declaration of Lisa Liberi, ¶ 29(b).	testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged “posting” and other acts. Lack of authentication and identification of exhibits. FRE 901 et seq. Argumentative.	Sustained: ____ Overruled: ____
10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27	29(c). “June 10, 2011 Orly Taitz posted a comment from her supporter on her website at http://www.ONLYTAITZESQ.COM?qp=22638 . Taitz supporter states “I hope people like Kleep, Berg, and Liberi learn you are a force they should not mess with.” See EXHIBIT “7.” Declaration of Lisa Liberi, ¶ 29(c).	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged “postings” and other acts. Lack of authentication and identification of exhibit.	Sustained: ____ Overruled: ____

1		FRE 901et seq.	
2		Argumentative.	
3	29(d). "June 12, 2011, Orly	Irrelevant. FRE 401, 402.	Sustained: ____
4	Taitz did an interview with	Speculation. Lacks	Overruled: ____
5	Sharon Rondeau with the Post	foundation. No showing of	
6	and Email newspaper. In this	personal knowledge of	
7	article, Orly Taitz falsely accused	declarant. FRE 602.	
8	me of being convicted of 27	Hearsay, and multiple level	
9	counts of forging documents;	hearsay. FRE 802 et seq.	
10	burglary; multiple convictions	Vague and ambiguous.	
11	for forging documents; that I	Inadmissible opinion	
12	called Taitz, offered my services;	testimony. FRE 701 et seq.	
13	worked for her and stole monies	Assumes facts not in	
14	from her and many more false	evidence, and no	
15	tales, see EXHIBIT "8". Mr.	foundation, regarding	
16	Berg sent a cease and desist and	alleged false accusations	
17	demand for retraction to Ms.	and other acts. Lack of	
18	Rondeau." Declaration of Lisa	authentication and	
19	Liberi,¶ 29(d).	identification of exhibit.	
20		FRE 901et seq.	
21		Argumentative.	
22	29(e). "June 15, 2011, Orly Taitz	Irrelevant. FRE 401, 402.	Sustained: ____
23	posted on her website at	Speculation. Lacks	Overruled: ____
24	http://www.ONLYTAITZESQ.COM/?p=	foundation. No showing of	
25	22789 "I filed multiple motion to	personal knowledge of	
26	dismiss a frivolous law suit by	declarant. FRE 602.	
27	Berg and Kreep. I've been	Hearsay, and multiple level	
28	harassed for 2 years with this	hearsay. FRE 802 et seq.	

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bogus law suit, where Berg's lead plaintiff and his paralegal Lisa Liberi claimed, that she was defamed, even though she was never defamed, and she is indeed a convicted document forger...with a total of 46 criminal charges..." "The Third Circuit Court of Appeals ordered the transferee court to rule on all outstanding motions. So far the judge on the case, Andrew Guilford, did not rule on the merits on one single motion to either dismiss the case or strike it under AntiSLAPP..." What it means, is that when one is filing a frivolous law suit against you, just to harass you and try to silence you as a whistle-blower, stifle your first amendment right to free speech, which is SLAPP-strategic law suit against public participation, a defendant, like myself, who is the real victim, has a right to bring an

Vague and ambiguous.
Inadmissible opinion testimony. FRE 701 et seq.
Assumes facts not in evidence, and no foundation, regarding alleged "posting." Lack of authentication and identification of exhibits.
FRE 901 et seq.
Argumentative.

1 2 3 4 5 6 7 8 9 10 11 12	a frivolous law suit and get her attorneys fees. For 2 years the federal court system is dragging its feet... The judge in Ca is not ruling on the merits either. I know that since early sixties the court system was used to keep dissidents marred in bogus law suits, but there has to be an end to this.” [emphasis added] See EXHIBIT “9”. Declaration of Lisa Liberi, ¶ 29(e).		
13 14 15 16 17 18 19 20 21 22 23 24 25 26 27	29(f). “June 15, 2011 Orly Taitz posted on her website at http://www.orlytaitzesq.com/?p=22819 “Unfortunately, I still have to deal with all the harassment by Berg, Kreep, Liberi, Otella and the court system, which was known to be used as a tool of harassment of dissidents since early 60s Civil rights movement. Clearly, keeping me mired in this aids and abetts Obama”, see EXHIBIT “10”. Declaration of Lisa Liberi, ¶ 29(f).	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged “posting.” Lack of authentication and	Sustained: ____ Overruled: ____

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	identification of exhibit. FRE 901et seq. Argumentative.	
29(g). June 19, 2011, Orly Taitz posted on her website at http://www.ONLYTAITZESQ.COM/?p=22970 “People like attorneys Gary Kreep and Philip Berg, who claim to be on the same side... for the last two years, but harass me with thousands of pages of defamation of my character in frivolous law suits. They attack me and my husband, where the only reasonable inference is, that their goal is not to go after Obama, but to go after me and my whole family, in order to deplete us out of money, time and emotional resources needed to fight Obama. Unfortunately our court systems allows them to do it for over 2 years now. Not one judge so far took the time to actually read the garbage of a complain written by Berg and his assistant, convicted document	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged “posting.” Lack of authentication and identification of exhibits. FRE 901et seq. Argumentative.	Sustained: ____ Overruled: ____

1 forger ... Lisa Liberi, and actually
2 read the motion to dismiss and
3 rule on those on the merits. They
4 summarily deny without
5 prejudice and allow a criminal
6 and her unethical attorneys, Berg
7 and Kreep to continue harassing
8 me, my husband, investigator
9 Sankey with a bogus law suit,
10 where they claim that they were
11 defamed, even though they were
12 never defamed. Now after 2
13 years of litigation, CA judge
14 Andrew Guilford allowed Berg
15 to amend his initial complaint,
16 which should have been
17 dismissed and instead of 87
18 complaint, he allowed Berg and
19 Kreep bring a 200 page
20 complaint full of complete
21 garbage, even though by CA law
22 this judge was supposed to
23 actually read the first complaint,
24 read antiSLAPP motion and
25 decide on the merits on the
26 motion, which would have ended
27 this harassment by Berg and
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1 2 3 4 5 6 7 8 9 10 11	<p>Kreep and their associates. I probably could do twice the amount of work I am doing now, fighting Obama, if not for the time and money I have to spend fighting Obots and fighting Berg and Kreep, who are worse, than all the obots, taken together.” [emphasis added] See EXHIBIT “11.” Declaration of Lisa Liberi, ¶ 29(g).</p>		
12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27	<p>29(h). “June 21, 2011, Orly Taitz posted on her website at http://www.ONLYTaitzesq.com/?p=23043; http://www.ONLYTaitzesq.com/?attachment_id=23044; http://www.ONLYTaitzesq.com/?attachment_id=23045; my family picture, a single picture of me that she calls a “mug” shot, some documents which Taitz’s claims I put a “hit” on my sister; and the print-out which Orly Taitz calls a “criminal record” and “rap sheet” along with following post “I got an e-mail and a call from Sharon</p>	<p>Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged “false statements” and other acts. Lack of authentication and</p>	<p>Sustained: ____ Overruled: ____</p>

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Rondeau, editor of “Post and E-mail” where she stated that she received a letter and phone call from Phil Berg and Lisa Liberi. Berg and Liberi attempted to harass and threaten Ms. Rondeau, demanding that she remove an article about them... she does not cave in, when people harass and threaten her.” “Gary Kreep teamed up with Berg, as his local CA counsel in harassing me, and trying to extort money from me and my husband via a frivolous bogus law suit, filed by Berg, Liberi and Ostella. They are also harassing with the same bogus law suit investigator Sankey as well as database companies Lexis Nexis and Intellius, which provided us information regarding Obama and Obama’s fraudulent use of CT SSN 042-68-4425. You tell me, on whose side are Gary Kreep and Philip Berg? The biggest problem here, as with Obama cases, is that the

identification of exhibit.
FRE 901et seq.
Argumentative.

1 judges have all this information		
2 and allow this to go on.” See		
3 EXHIBIT “12”, there are many		
4 more false statements in this		
5 article as well.” Declaration of		
6 Lisa Liberi,¶ 29(h).		
7 29(I). “June 23, 2011 Orly Taitz	Irrelevant. FRE 401, 402.	Sustained: ____
8 posted on her website at	Speculation. Lacks	Overruled: ____
9 http://www.ONLYTAITZESQ.COM/?p=	foundation. No showing of	
10 23174 “I have to spend hundreds	personal knowledge of	
11 of hours dealing with hundreds	declarant. FRE 602.	
12 of pages of harassment of me,	Hearsay, and multiple level	
13 which are coming from Berg and	hearsay. FRE 802 et seq.	
14 Kreep and Liberi and Ostella”,	Vague and ambiguous.	
15 see EXHIBIT “13”. Declaration	Inadmissible opinion	
16 of Lisa Liberi,¶ 29(I).	testimony. FRE 701 et seq.	
17	Assumes facts not in	
18	evidence, and no	
19	foundation, regarding	
20	alleged “posting.” Lack of	
21	authentication and	
22	identification of exhibit.	
23	FRE 901et seq.	
24	Argumentative.	
25 29(j). “June 25, 2011, Orly Taitz	Irrelevant. FRE 401, 402.	Sustained: ____
26 posted on her website at	Speculation. Lacks	Overruled: ____
27 http://www.ONLYTAITZESQ.COM/?p=	foundation. No showing of	
28 23227 Orly Taitz states “Please,	personal knowledge of	

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1 read this article by the editor of
2 Post and E-mail. The same way
3 as Philip Berg is harassing me,
4 my husband, investigator Sankey,
5 companies provided Obama's
6 SSN, he is now harassing editor
7 of "Post & Email" for providing
8 truthful information about him
9 and his associates. It is time for
10 our courts to start doing their job
11 and stopping such behavior."
12 "Gary Kreep is Berg's local
13 California counsel on the case.
14 According to the code of
15 professional ethics Kreep had to
16 do minimal investigation before
17 singing up as co-counsel on the
18 case. If Gary Kreep were to do
19 minimal investigation, and were
20 to check Liberi's 87 page
21 criminal record in the superior
22 court of San Bernardino County
23 CA, he would know, that Berg,
24 Liberi and Ostella are the ones,
25 who engaged in harassment
26 Liberi and Ostella are the ones,
27 who engaged in harassment and
28

declarant. FRE 602.
Hearsay, and multiple level
hearsay. FRE 802 et seq.
Vague and ambiguous.
Inadmissible opinion
testimony. FRE 701 et seq.
Assumes facts not in
evidence, and no
foundation, regarding
alleged "posting." Lack of
authentication and
identification of exhibit.
FRE 901 et seq.
Argumentative.

1 bullying. It was unethical for
2 Kleep to sign up on this case. If
3 you look at the people, that they
4 are harassing those are the ones,
5 who are at the forefront of
6 fighting Obama... For two years
7 I've been filing motions to
8 dismiss. The courts did not rule
9 with prejudice, meaning that they
10 did not rule on the merits of these
11 motions and are allowing this
12 harassment to go on for 2 years,
13 even though prior judge on the
14 case, Eduardo Robreno, has
15 written in his opinion, that Berg,
16 Liberi and Ostella were not
17 believable as witnesses... Since
18 the civil rights movement of the
19 60s the court system was used for
20 harassment of civil rights leaders
21 and dissidents against the
22 establishment. I am afraid, that
23 this is the true reason, why this
24 case lingers in courts for two
25 years. Hundreds of attorneys
26 who read the case, the complaint
27 and the evidence are horrified at
28

1 what is happening in the court
2 system, how such garbage is
3 allowed to linger for 2 years, why
4 Berg is not sanctioned or
5 disbarred for fraud on the court,
6 for bringing a bogus complaint,
7 claiming that he and his assistant
8 were defamed, that she is an
9 innocent woman, residing in PA,
10 while he knew, that she is indeed
11 a felon, who had 46 criminal
12 charges of..burglary...At the
13 time he filed this case, he knew,
14 that she was nowhere near PA,
15 that she was on probation and
16 that it was a totally bogus law
17 suit filed for purpose of
18 harassment and bullying. It is
19 shocking that the judges are
20 allowing this to go on for two
21 years, without dismissing the
22 case and sanctioning Berg for
23 fraud, for bullying and
24 harassment. Att. Philip J. Berg
25 Accuses the Post & Email of
26 Libel and Slander; Threatens to
27 Sue The Post & Email
28

1 thepostemail.com/2011/06/25/at		
2 t-philip-j-berg-		
3 ac...97.74.144.93,” see EXHIBIT		
4 “14”.” Declaration of Lisa		
5 Liberi,¶ 29(j).		
6 29(k). “June 26, 2011 Orly Taitz	Irrelevant. FRE 401, 402.	Sustained: ____
7 posted on her webiste at	Speculation. Lacks	Overruled: ____
8 http://www.orlytaitzesq.com/?p=	foundation. No showing of	
9 23263 the following “I am	personal knowledge of	
10 providing information showing	declarant. FRE 602.	
11 retaliation by the regime against	Hearsay, and multiple level	
12 the civil rights and dissident	hearsay. FRE 802 et seq.	
13 opposition leaders like me. I am	Vague and ambiguous.	
14 providing information about	Inadmissible opinion	
15 psyops used from the 60 civil	testimony. FRE 701 et seq.	
16 rights movement, use of known	Assumes facts not in	
17 criminals and use of courts to	evidence, and no	
18 attack the leaders of opposition	foundation, regarding	
19 with bogus law suits to waste	alleged “posting.” Lack of	
20 their time and financial resources	authentication and	
21 and keep them unable to fight the	identification of exhibits.	
22 regime. I am bringing as an	FRE 901et seq.	
23 example a bogus law suit filed by	Argumentative.	
24 attorneys Philip Berg and Gary		
25 Kreep, where they bring as a lead		
26 plaintiff a convicted thief and		
27 forger Lisa Liberi, claiming that		

1 she was defamed, even though
2 she was never defamed and all of
3 the information about her was
4 truthful. For two years now
5 multiple federal courts are
6 refusing to rule on the merits of
7 the motions to dismiss simply to
8 keep me occupied and unable to
9 go after Obama. I am bringing
10 forward information of the courts
11 covering up Obstruction of
12 Justice by the court employees.
13 Court reporter Dona Anders in
14 the Eastern district of PA
15 forward to me a certified copy of
16 the transcript, where she
17 attempted to aid Liberi and Berg
18 by removing 14 pages of
19 testimony, which would be
20 highly detrimental to Liberi and
21 Berg...Chief judge of the Third
22 Circuit Judge McKee simply
23 buried the complaint. No action
24 was taken by the District
25 Attorney of Philadelphia, US
26 attorney or inspector
27 general...When the courts refuse
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	to act, when the courts allow themselves to be tools of harassment, legal extortion, when court employees are engaged in obstruction of justice, spoliation of evidence, tampering with evidence and the judges are looking the other way, that is a sign of tyranny and total lack of human rights in the United States of America. It is time for the world community and the US citizens to address violations of human rights in the U.S. during the Obama regime.” See EXHIBIT “15”. Declaration of Lisa Liberi, ¶ 29(k).		
18 19 20 21 22 23 24 25 26 27	29(l). “June 29, 2011, Orly Taitz posted on her website at http://www.OnlyTaitzesq.com/?p=23326 my family photograph, a single picture of me that Taitz calls a “mug shot”, and the print-out which Taitz’s calls my “criminal record” and “criminal rap sheet” along with the following “I need your help in	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq.	Sustained: ____ Overruled: ____

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getting media in the courtrooms”
I need as any media outlets as
possible covering, what is going
on in the courtroom of judge
Andrew Guilford, Central
District of CA, Santa Ana (same
district, where judge Carter is
working), where I, investigator
Sankey, database companies
Choice Point, Lexis Nexis,
Intelius (all the companies, that
supplied me with Obama’s social
security numbers) and even
Oracle are being harassed with a
bogus law suit brought by Philip
Berg and his local CA counsel
Gary creep, (both of claim to be
on our side) whose lead plaintiff
is Lisa Rene Richardson Liberi,
...Liberi is Berg’s assistant,
drafting pleadings for him. The
case was filed for defamation,
libel and assault. They tried to
create an illusion, that Lisa
Liberi is a different person, not
one convicted in Ca but some
other Liberi residing in PA.

Assumes facts not in
evidence, and no
foundation, regarding
alleged “posting.” Lack of
authentication and
identification of exhibits.
FRE 901et seq.
Argumentative.

1 AntiSLAPP (this is a special CA
2 motion brought to dismiss bogus
3 law suits, which were brought to
4 try to silence the whistleblowers,
5 to affect the right of the public to
6 exercise their free speech.

7 Without even addressing a work
8 of the initial 85 page complaint
9 or a work or a single argument of
10 the motion to dismiss, after the
11 answer to the complaint was
12 already filed and the case was
13 litigated for 2 years, judge
14 Guilford summarily denied the
15 motion to dismiss and allowed
16 Berg, Kreep, Liberi and Ostella
17 to file an amended complaint (a
18 new complaint, which is 197
19 pages of complete garbage.)

20 Now instead of working on
21 removing usurper Obama from
22 office, I need to waste an
23 enormous amount of time,
24 dealing with a new avalanche of
25 garbage. I filed an appeal of
26 Guilford's decision and also
27 requested a leave of court to file
28

an antiSLAPP motion to dismiss the amended complaint. No answer from Guilford yet, whether he will allow AntiSLAPP of the amended complaint, and if he does, whether he will dismiss the amended complaint on Ca AntiSLAPP. Additionally if within 2 years not Judge Robreno in Philadelphia, not the Third Circuit Court of Appeals, not judge Guilford took time to even read the initial 85 page complaint and see what kind of garbage it was, how can I expect any justice going forward. What is the point of bringing forward hundreds of pages of evidence and argument if within 2 years not one single judge took the time to read them and rule with prejudice (meaning on the merits). They simply allowed a criminal, who is a vexatious plaintiff and her unethical attorney, whose actions are bordering on criminal, to

1 harass me nonstop..." See 2 EXHIBIT "16". Orly Taitz also 3 had this post with pictures posted 4 on 5 http://www.skypeassholes.com , 6 see EXHIBIT "17". Declaration 7 of Lisa Liberi, ¶ 29(l).		
8 29(m). "June 29, 2011, Orly 9 Taitz posted on her website at 10 http://www.orlytaitzesq.com/?p= 11 23350 "There will be media 12 present at the court hearing in 13 Liberi v Taitz, so the public can 14 see all the certified records, 15 showing that Liberi was indeed 16 convicted of forgery and theft, 17 there was no defamation, no 18 harassment, and Berg and Kreep 19 are harassing me with a totally 20 bogus law suit and preventing me 21 from spending time on Obama 22 litigation" See EXHIBIT "18". 23 Declaration of Lisa Liberi, ¶ 24 29(m).	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged "posting." Lack of authentication and identification of exhibit. FRE 901 et seq. Argumentative.	Sustained: ____ Overruled: ____

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	<p>29(n). “July 5, 2011, Orly Taitz posted on her website at http://www.oryltaitzesq.com/?p=23386 “At the same time Berg and Kreep, who claim to be patriots continue harassing me with a bogus law suit, claiming that I owe them and their client convicted criminal Lisa Liberi 3 billion dollars for defamation and invasion of privacy, even though she was never defamed, the woman indeed had 27 criminal charges in Ca, her sister reported to the police 19 prior criminal charges...All of her information came from public records. This complete garbage was supposed to be dismissed a long time ago, but the courts allow them to continue harassing e for 2 years, judges simply don’t take the time to read the complaint and the motions to dismiss, AntiSLAPP motions and end this harassment, so I have to waste hundreds and hundreds of hours and hundreds</p>	<p>Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged “posting.” Lack of authentication and identification of exhibits. FRE 901et seq. Argumentative.</p>	<p>Sustained: ____ Overruled: ____</p>
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1 of dollars instead of spending
2 this time on prosecuting
3 ObamaFraudGate, which is the
4 number one crime in the country
5 today or ever.” See EXHIBIT
6 “19”. Orly Taitz also had this
7 posted on
8 <http://domesticenemies.net> with a
9 threatening message, see
10 EXHIBIT “20” and on
11 <http://www.skypeassholes.com>,
12 see EXHIBIT “21”. The
13 comment regarding my sister is
14 completely untrue as I did not
15 have nineteen previous charges
16 against me, for my sister or
17 anyone else to disclose. My
18 sister died in 2005. I did not
19 have 27 counts or charges against
20 me at any time either.”
21 Declaration of Lisa Liberi,¶
22 29(n).

23 29(o). “July 10, 2011, Orly Taitz
24 posted on her website at
25 [http://www.orlytaitzesq.com/?p=](http://www.orlytaitzesq.com/?p=23721)
26 [23721](http://www.orlytaitzesq.com/?p=23721) an article written by
27 MinutemanCDC_SC on behalf of

Irrelevant. FRE 401, 402.
Speculation. Lacks
foundation. No showing of
personal knowledge of
declarant. FRE 602.

Sustained: ____
Overruled: ____

the tea party nation on her behalf
based on her false tales about me,
the following “Discredited” is
not an accurate “diss” against
Mrs. Taitz. She has been
discounted, disrespected,
disclaimed, disallowed,
disapproved of, disbelieved,
discarded, discharged by a client
or two, discriminated against for
her Moldovan accent, disdained
for her law school credentials,
disjoined (wrongly) by Lisa
Liberi and Atty. Phil Berg,
disfavored, disliked, dishonored,
dislodged from her place of
comfort and respect in Beverly
Hills, dismissed as a legal
lightweight (the opposite of an
unlawful heavy, I suppose),
disowned by some supporters
and defenders of the Constitution
for circumventing their
”lawyers’ unwritten code of
conduct,” disparaged and
distorted by the Lamestream
Media, frequently and rudely

Hearsay, and multiple level
hearsay. FRE 802 et seq.
Vague and ambiguous.
Inadmissible opinion
testimony. FRE 701 et seq.
Assumes facts not in
evidence, and no
foundation, regarding
alleged “posting.” Lack of
authentication and
identification of exhibit.
FRE 901et seq.
Argumentative.

1 2 3 4 5 6 7 8 9 10 11 12 13	disrupted by her opponents, and dispatched, dispelled, dispersed, displaced, disobliged, dispensed with, disposed of, and disserved by numerous judges, who appear to want to put this “not-one-of- our-kind” upstart in her place.” See EXHIBIT “22”. The minutemen are a group of individuals who are against illegal immigration in America.” Declaration of Lisa Liberi,¶ 29(o).		
14 15 16 17 18 19 20 21 22 23 24 25 26 27	29(p). July 22, 2011, After this Court sanctioned Defendant Orly Taitz and her Attorney’s Orly Taitz immediately refilled yet another document which she called a “Reconsideration” and a “Letter seeking Leave”. This document falsely accuses the Plaintiffs of being “dangerous criminals”; of violating this Court’s Orders; falsely stating that I had 46 felony criminal counts against me; falsely implying this Court is being	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged “postings.” Lack of	Sustained: ____ Overruled: ____

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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	<p>prejudicial, etc. Orly Taitz filed this document as a press release. Orly Taitz, as an Attorney, is mindful that her supporters, readers and followers are “lay” people and do not understand the law. Orly Taitz knows they will believe what she states. Orly Taitz used this Court’s docket to further substantiate her postings to her followers, readers and supporters to arouse their emotions. Orly Taitz published this document on her website at http://www.orlytaitzesq.com/?p=24049, see EXHIBIT “23” at http://www.orlytaitzesq.com/?attachment_id=24048 and at http://www.orlytaitzesq.com/wp-content/uploads/2011/07/Liberi-v-Taitz-final-request-for-reconsideration.pdf, see EXHIBIT “24”. Declaration of Lisa Liberi, ¶ 29(p).</p>	<p>authentication and identification of exhibits. FRE 901et seq. Argumentative.</p>	
25 26 27 28	<p>29(q). “July 22, 2011 Orly Taitz posted on her website the Motion to Dismiss on behalf of Orly</p>	<p>Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of</p>	<p>Sustained: ____ Overruled: ____</p>

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	<p>Taitz, Inc. which she filed with this Court on July 19, 2011 and one of the documents she was sanctioned by this Court for filing without Leave of Court. This document contains many false statements and accusations about Plaintiffs. After Orly Taitz was Sanctioned, she published this document on her website at http://www.orlytaitzesq.com/?p=24052, see EXHIBIT "25" and on her website at http://www.orlytaitzesq.com/?attachment_id=24051 and http://www.orlytaitzesq.com/wp-content/uploads/2011/07/Liberi-v-Taits-motion-to-dismiss-by-Orly-Taitz-inc.pdf Declaration of Lisa Liberi, ¶ 29(q).</p>	<p>personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged "posting." Lack of authentication and identification of exhibit. FRE 901 et seq. Argumentative.</p>	
21 22 23 24 25 26 27 28	<p>30 (mistakenly labeled "29"). "The most recent threatening posts outlined above have been reported to my local law enforcement authorities." Declaration of Lisa Liberi, ¶ 30 (mistakenly labeled "29").</p>	<p>Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq.</p>	<p>Sustained: ____ Overruled: ____</p>

	Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding the alleged “posts” and threats. Argumentative.	
31 (mistakenly labeled “30”). “Orly Taitz also published all the above posts on her accounts with Facebook (in approximately 8 places on Facebook); beforeitsnews.com; friends feed; twitter; freedables.com; and other social network sites and search engines including internationally and in foreign languages. We have copies and all the links should the Court wish them to be filed. Orly Taitz also sent these posts through hundreds of RSS feeds to thousands of websites for posting.” Declaration of Lisa Liberi,¶ 31 (mistakenly labeled “30”).	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged “posts.” Lack of identification of documents referred to. FRE 901 et seq. Argumentative.	Sustained: ____ Overruled: ____

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	32 (mistakenly labeled "31"). "There is absolutely no permissible purpose, no tangible reason for all these postings regarding me, Lisa Ostella or our attorney's and it does not serve any legitimate purpose. All these postings since 2009 have kept me living in daily fear for myself, son and husband. Further, it has caused me and my family severe (substantial) emotional and mental distress to the point I ended up hospitalized for heart complications due to the stress and repeated emergency personnel at my home due to heart complications and other medical complications caused by the harassment and stress." Declaration of Lisa Liberi, ¶ 32 (mistakenly labeled "31").	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged "postings." Lack of authentication and identification of exhibits. FRE 901 et seq. Argumentative.	Sustained: ____ Overruled: ____
23 24 25 26 27 28	33 (mistakenly labeled "32"). "All of the above posts I obtained by going directly to Orly Taitz website at www.oryltaitzesq.com and in the search box typing	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602.	Sustained: ____ Overruled: ____

1 2 3 4 5 6 7 8 9 10 11 12 13 14	“Liberi” each and every post with my name came up, at which time I took a screen shot and printed the page to PDF. The above 17 exhibits are only over the past 1-1/2 months and is the same posting Orly Taitz has done regarding me since April 2009, all with false tales, false allegations, where I am being blamed for what Orly Taitz is actually doing to us.” Declaration of Lisa Liberi, ¶ 33 (mistakenly labeled “32”).	Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged “posts” and “false tales” and “false allegations.” Lack of identification of documents referred to. FRE 901 et seq. Argumentative.	
15 16 17 18 19 20 21 22 23 24 25 26 27	34 (mistakenly labeled “33”). “Orly Taitz incites people against us, as proven by the postings by her own web person, Bob Stevens on www.skypeassholes.com and http://domesticenemies.net , as well as Taitz own statements. I certainly believe this justifies and substantiates her cyber-stalking of me and Lisa Ostella. Declaration of Lisa Liberi, ¶ 34 (mistakenly labeled “33”).	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding	Sustained: ____ Overruled: ____

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	alleged “postings.”	
	Argumentative.	
35 (mistakenly labeled “34”).	Irrelevant. FRE 401, 402.	Sustained: ____
“Your Honor, Orly Taitz will not	Speculation. Lacks	Overruled: ____
stop until the Court’s force her to	foundation. No showing of	
stop her illegal and damaging	personal knowledge of	
conduct.” Declaration of Lisa	declarant. FRE 602.	
Liberi, ¶ 35 (mistakenly labeled	Hearsay. FRE 802 et seq.	
34).	Vague and ambiguous.	
	Inadmissible opinion	
	testimony. FRE 701 et seq.	
	Assumes facts not in	
	evidence, and no	
	foundation, regarding	
	alleged “illegal and	
	damaging conduct.”	
	Argumentative.	

B. *Objections to Declaration of Plaintiff, Lisa Ostella*

EVIDENTIARY OBJECTIONS

DECLARATION OF PLAINTIFF, LISA LIBERI	MOVING DEFENDANT’S OBJECTIONS	COURT’S RULING
1. “I worked in several companies during my years that required teaching others how to use software applications. My business, Go Excel Global, also	Irrelevant. FRE 401, 402. Inadmissible opinion testimony. FRE 701 et. seq. Hearsay. FRE 802 et seq. Vague and ambiguous.	Sustained: ____ Overruled: ____

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	taught classes at a Chamber of Commerce to small business how to compete with big box stores through eCommerce. People I've taught that don't know how to use computers behave quite differently than Orly Taitz, herein often referred to as "Taitz." People that don't know how to use computers need their hand held in understanding the difference between personal computer functions versus Internet functions. This is not the case with Orly Taitz. Taitz is malingering for creating plausible deniability." Declaration of Lisa Ostella, ¶ 1.	Argumentative. No foundation regarding Orly Taitz' alleged computer skills. Speculation.	
19 20 21 22 23 24 25 26 27	2. "When I first started working with Taitz in fall 2008, she brought to the table that her business website, drtaitz.com, was hacked by "Obama thugs" and wanted that posted at drorly.blogspot.com where I was her assistant webmaster. I did not want that posted until it was	Hearsay. FRE 802 et. seq. Irrelevant. FRE 401, 402. Inadmissible opinion testimony. FRE 701 et. seq. Speculation. No foundation for Orly Taitz' "lies". Argumentative. Vague and ambiguous.	Sustained: ____ Overruled: ____

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1 2 3 4 5 6 7 8 9 10	investigated. Taitz was very allusive during all my questions to find out what happened to drtaitz.com. In the end of my invetstigations, it turned out she lied. Her husband, Yosef Taitz, set up the site drtaitz.com and Taitz took her own domain off the virtual host for the site.” Declaration of Lisa Ostella,¶ 2.		
11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27	3. “Next, Taitz wanted a PayPal account set up for Defend Our Freedoms Foundation, December 2008. She told me she didn’t know how to do it because she never had a PayPal account before. This was another lie. One of the problems I encountered in setting up the PayPal account was her email; dr_taitz@yahoo.com was already associated with a PayPal account. She, or Yosef Taitz, had set up a PayPal for her personal use in October 2008. Therefore, Bob Stevens, her head webmaster, had to set up gmail e-email	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay. FRE 802 et. seq. Inadmissible opinion testimony. FRE 701 et. seq. No foundation regarding alleged “lie.” Lack of authentication and identification of exhibit. FRE 901 et. seq.	Sustained: ____ Overruled: ____

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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	accounts for her in order to continue the set up of her new PayPal account because PayPal does not allow emails to be associated with more than one account, see PayPal Records attached as Exhibits "22" and "23", Docket number 190-5 and Understanding the Internet, PayPalGate, see Plaintiffs ORiginal complaint, filed May 4, 2009, Docket number 1 at pages 13 through 15, paragraphs 44-52; and Affidavit of Lisa Ostella filed August 27, 2009, Docket number 107-1, pages 17-32. Declaration of Lisa Ostella, ¶ 3.		
18 19 20 21 22 23 24 25 26 27	4. "While working as an assistant at drorly.blogspot.com, Taitz kept very close monitoring of what comments were allowed from people posted under her articles on her blog. Her head webmaster, Bob Stevens, not real name; but the name I knew him by, set up a 3 rd party program JS- Kit by HaloScan so Taitz would	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et. seq. Assumes facts not in	Sustained: ____ Overruled: ____

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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	have an easier time blocking people by Ips. When Taitz's blog started redirecting to porn sites and trying to force command downloads on my computer, I signed into her gmail account. There was the link to the control panel for her JS-Kit controls. I went to the control panel to investigate the problems we were having on the drorly.blogspot.com. See Plaintiffs Original complaint, filed May 4, 2009, Docket number 1 at pages 13 through 15, paragraphs 44-52; and Affidavit of Lisa Ostella filed August 27, 2009, Docket number 107-1, pages 17 through 32." Declaration of Lisa Ostella, ¶ 4.	evidence, and no foundation, regarding alleged reason for setting up a "3 rd party program JS-Kit by HaloScan." Lack of authentication and identification of exhibit. FRE 901 et. seq.	
21 22 23 24 25 26 27 28	5. "I was overwhelmed by all the data I saw that this JS-Kit was collecting. There were multiple panel views everywhere much like an FTP program. Data was being collected on blog visitors and uploaded to a different	Irrelevant. FRE 401, 402. Hearsay. FRE 802 et seq. Vague and ambiguous. Lacks foundation. Speculation. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	Sustained: ____ Overruled: ____

1 2 3 4 5 6	server. This was all under the control of Taitz's control panel. This was not someone who did not understand computers, let alone the Internet." Declaration of Lisa Ostella,¶ 5.		
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27	6. "Taitz came over to sue my blog site, still protesting she had no idea about anything I had found. She blamed it all on Bob Stevens. I gave her access to my blog for her to post and monitor comments. Taitz right away settled in and was using features in my blog control panel that I had never used. She was using the blog as a private mail relay, remote blogging and email blogging all set up without any need for me to give her a tour of the broadcast control panel. Please note this broadcast site was different software than the blogspot software and had different features. Taitz would also setup posts that she would keep and want left in draft as	Irrelevant. FRE 401, 402. Hearsay. FRE 802 et seq. Lacks foundation. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence. No showing of personal knowledge of declarant regarding whether Ms. Taitz was the one to "setup posts that she would keep and want left in draft as well as posts with unusual Google Tags." Argumentative.	Sustained: ____ Overruled: ____

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1 well as posts with unusual 2 Google Tags, such as: 3 'googlea72548778058f8bc.html' 4 and I would never get an 5 explanantion as to what these set 6 ups were for. All of these 7 behaviors led me further to 8 believe that her statements that 9 she did not understand computers 10 was inaccurate." Declaration of 11 Lisa Ostella,¶ 6.		
12 7. "Also, Taitz had no problems 13 utilizing VOIP or video 14 conferencing. She video 15 conferenced multiple interviews 16 as well as sat in on Citizen Grand 17 Juries remotely." Declaration of 18 Lisa Ostella,¶ 7.	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. Hearsay. FRE 802 et seq.	Sustained: ____ Overruled: ____
19 8. "Even observing her Internet 20 activity as an outsider now, Taitz 21 is utilizing developer tools with 22 Facebook to thread all of her site 23 activity for her blogs and social 24 networks. These are not 25 behaviors of someone that does 26 not know the Internet. However, 27 Taitz definitely wants to project 28 that she doesn't know computers.	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in	Sustained: ____ Overruled: ____

1 2 3 4 5	She needs that image to make others believe her sites were and are constantly hacked and monies stolen. Why is that?" Declaration of Lisa Ostella, ¶ 8.	evidence. Argumentative.	
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27	9. "In December 2008, Taitz, had me searching for a book on Vatel so she could reference the definition on Natural Born Citizen. I found a book online and purchased it. I had inadvertently purchased a book in PDF format rather than a physical book. I downloaded the PDF format. The download format cost \$24.95. I used this downloaded format to send to people as a thank you for donating to Taitz's Defend Our Freedoms Foundations, Inc. I was able to see the donations coming in because my email was in the Defend Our Freedoms Foundation PayPal account as a customer service representative. So, as donations were made to Taitz, I sent a thank you letter	Irrelevant. FRE 401, 402. Hearsay. FRE 802 et seq. Speculation. Lacks foundation.	Sustained: ____ Overruled: ____

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1 2 3 4 5 6 7 8 9	with a link to a free download of the Vatel paper on Natural Born Citizen. Taitz sent me a check for \$25.00 to reimburse me for this PDF format book. The check was issued from her dental practice and not from her personal account.” Declaration of Lisa Ostella,¶ 9.		
10 11 12 13 14 15 16 17	10. “In January 2009, Taitz wanted to utilize me further as a legal assistant. I told her on many occasions I had never worked in law before. January to February 2009, I was tasked with creating subpoenas.” Declaration of Lisa Ostella,¶ 10.	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. Hearsay. FRE 802 et seq.	Sustained: ____ Overruled: ____
18 19 20 21 22 23 24 25 26 27 28	11. “February 2009, Taitz wanted me to write legal briefs for her Military and Politician Case. I told her again I did not have legal experience and I had never seen a brief before. Taitz asked me if I had a Lexis account to find briefs and copy them. I had never heard of Lexis at this point and did not know what she was talking about. Taitz brought	Irrelevant. FRE 401, 402. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Speculation. Lacks foundation.	Sustained: ____ Overruled: ____

in a volunteer that was a retired paralegal to work with me in or around February 18, 2009. I worked with this former paralegal for only a few weeks (name and contact can be furnished under seal.) I sent the paralegal copies of everything Taitz had sent me and she started helping organize the material and plaintiffs for the suit. The paralegal had strongly suggested breaking the cases out to a Military and a separate Representative suit rather than having all the plaintiffs on one suit. I assisted with organizing the Plaintiffs.” Declaration of Lisa Ostella,¶ 11.

12. “We never got around to writing the brief. The paralegal did not last that long as a volunteer. The first task the paralegal had me assist with was to contact Taitz’s clients to verify their consent to be Plaintiffs. We did not complete that task. The

Irrelevant. FRE 401, 402. Lacks foundation. Hearsay, multiple level hearsay. FRE 802 et seq. Speculation.

Sustained: ____
Overruled: ____

first few we had contacted had no idea they were Plaintiffs in a lawsuit. We brought that to Taitz's attention. Taitz yelled and screamed that we had no right contacting her clients. Taitz accused the paralegal of trying to steal her clients. Taitz fired the paralegal and ordered me never to speak with the paralegal again. The Military and Representative Suits we were supposed to be working on were never written." Declaration of Lisa Ostella,¶ 12.

13. "The same above mentioned paralegal called me late on May 6th, 2009. Apparently Taitz had listened to an interview Phil Berg had on Patriots Heart Network and was seeing plaid. The paralegal was extremely concerned and strongly encouraged me to take my kids out of school and move immediately. The paralegal told me to stay aware of where my

Irrelevant. FRE 401, 402. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Argumentative. Speculation. Lacks foundation.

Sustained: ____
Overruled: ____

1 2 3 4 5 6 7 8 9 10 11	dogs were at all times, if they went silent, to call the police fast. She told me to make arrangements with my husband to call and check on me often and if I didn't answer the phone, to call the police fast. She said Orly Taitz threatened that professionals were going to be used to "get my kids." Declaration of Lisa Ostella, ¶ 13.		
12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27	14. "I reported this to the North Brunswick Police. My contact was Detective Cano. The threats started to increase. Payment requests had been submitted to Prly Taitz's, Defend Our Freedoms Foundation PayPal account for a total sum of \$25,000 in three consecutive increments under the \$10,000 reporting laws on two separate occasions; see Ruben Nieto payment requests, Exhibits "138" and "139" filed on may 20, 2011, docket numbers 190-24 and 190- 25. I ran a social networking	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. Hearsay. FRE 802 et seq. Vague and ambiguous. No showing of personal knowledge of declarant. FRE 602. Lack of authentication and identification of exhibit. FRE 901 et seq.	Sustained: ____ Overruled: ____

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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	search in Spokeo.com using the email Ruben Nieto used in the PayPal payment request and learned he resided in Albuquerque, New Mexico, close to Lisa Liberi's home. It was also discovered in the New Mexico Judiciary that Nieto had been convicted of serious violent type offenses. I heard this man was hired by Taitz to harm me, Lisa Liberi, and our families as had been threatened by Orly Taitz." Declaration of Lisa Ostella, ¶ 14.		
16 17 18 19 20 21 22 23 24 25 26 27	15. "I was provided a Court date in North Brunswick to appear regarding the criminal threats made by Taitz. The Court sent a subpoena to Orly Taitz to appear for criminal court to establish whether there was sufficient cause to charge her criminally. Taitz never appeared. The Judge handling this procedure stated he had spoken with the Federal Bureau of Investigations (FBI);	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. Hearsay, and multiple level hearsay. FRE 802 et seq. No showing of personal knowledge of declarant. FRE 602. Argumentative.	Sustained: ____ Overruled: ____

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1 2 3 4 5 6	and he had to close the proceedings. I was scared to death that Orly Taitz was going to harm me, my children and husband.” Declaration of Lisa Ostella,¶ 15.		
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27	16. “August 7, 2009, we had our TRO hearing before Judge Robreno in Pennsylvania. I testified to the criminal report I had filed; the threats by Orly Taitz to have my children professionally kidnapped and my fear, see the August 7, 2009 Transcript, docket number 141, pages 68 through 80, my testimony regarding Orly Taitz’s threat to have my children professionally kidnapped and the Police report are located on page 71, lines 22-25; page 72, lines 4-7; the balance of my testimony through page 80 of this transcript relates to the threats being posted on the Internet about me, my family and Plaintiff, Lisa Liberi.” Declaration of Lisa Ostella,¶ 16.	Irrelevant. FRE 401, 402. Hearsay, and multiple level hearsay. FRE 802 et seq. Lack of authentication and identification of exhibit. FRE 901 et seq.	Sustained: ____ Overruled: ____

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17. “Judge Robreno denied our TRO, I was horrified and scared to death for my children’s lives and the life of me and my husband.” Declaration of Lisa Ostella,¶ 17.	Irrelevant. FRE 401, 402. Hearsay. FRE 802 et seq.	Sustained: ____ Overruled: ____
18. “Taitz had put out multiple messages containing various threats against us and they were increasing. A GlueText search query done on 7/23/11 shows a total of 743 articles in current circulation on the Internet, cite: http://www.gluetext.com/content/lisa_ostella.html . GlueText search scripts only return live links and includes the publishing source as well as last date published. Most of these articles and posts were published by Taitz through her developer’s applications as per the provided source in the GlueText search query. That is further proof that she is not naive when it comes to computers and the Internet. 95% of these returns show	Irrelevant. FRE 401, 402. Hearsay, and multiple level hearsay. FRE 802 et seq. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Vague and ambiguous. Assumes facts in evidence and no foundation regarding “GlueText.” Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	Sustained: ____ Overruled: ____

<p>1 articles, posts with Taitz's false 2 claims of my criminal activity 3 and criminal record. Taitz 4 continues to post about us and 5 this case even after Judge 6 Guilford sanctioned her, 7/22/11. 7 No average persocontact would 8 know or believe that the 9 accusations are not true. Average 10 people are not in contact with the 11 service providers like we have 12 been. The service providers that 13 host these sites tell us we cannot 14 have these stories removed 15 without a court order as per their 16 standard policy." Declaration of 17 Lisa Ostella,¶ 18.</p>		
<p>18 19. Taitz had contact directly 19 and indirectly with my neighbors, 20 people in my town, my county 21 and two other counties I worked 22 in when we lived in North 23 Brunswick. She sent her posts 24 with false assertions and 25 accusations to them through the 26 email, through links and third 27 person outreach. Taitz, with her</p>	<p>Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq.</p>	<p>Sustained: ____ Overruled: ____</p>

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1 associates reached out to every
2 customer I had as Go Excel
3 Global, associates of mine in
4 town, county and the Chamber of
5 Commerce's my business
6 belonged to and told them I had a
7 felony record and I was stealing
8 from her Nonprofit Foundation.
9 Taitz and her associates reported
10 me and my business, Go Excel
11 Global to the North Brunswick
12 Police, the New Jersey FBI, New
13 Jersey State Consumer Affairs,
14 North Brunswick Republican
15 Organization, Middlesex County
16 Republican Organization;
17 individual customers found listed
18 with my domain name and
19 politicians I had worked for.
20 Search engines run on my name
21 brings up endless listings of
22 'Crimes by Lisa Ostella'. She
23 did this as an attorney with the
24 backing of a Private Investigator
25 with Scotland Yard credentials
26 and did this through a person that
27 works as a Minister and Author.

Assumes facts not in
evidence, and no
foundation, regarding
alleged "posts" and
"emails." Argumentative.

1 2 3	And no one shut her down. So no one knew what to believe.” Declaration of Lisa Ostella,¶ 19.		
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26	20. “We moved to get away from the fear and humiliation caused by Taitz. Since these stories and posts continue to be published and republished, my new neighbors and people my family and I are involved with such as school, club activities, and my husband’s work colleagues and students are now seeing these posts and articles. People are trying to tip toe around the information politely; but, they are wondering if I am a criminal and are making decisions based on this confusion. I will never be able to undo these perceptions. My children an husband, who is professionally credentialed, has become victims of these perceptions too. Declaration of Lisa Ostella,¶ 20.	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Hearsay, and multiple level hearsay. FRE 802 et seq. Argumentative.	Sustained: ____ Overruled: ____
27 28	21. “During the same time Taitz was posting my personal	Irrelevant. FRE 401, 402. Speculation. Lacks	Sustained: ____ Overruled: ____

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	information, such as: name, address, phone number, maiden name, and names of my family members, my social security number and personal information on the Internet and showed up in the slavehack.com database see Plaintiffs First Amended Complaint on page 56, paragraph 133. Slavehack.com is an online game for hackers. Slavehack is for training hackers to crack computers, servers and banks as well as live time attacks. Attached as EXHIBIT "1" is a partial member list. This list alone includes some very well known hacker groups including 4Chan, a known anonymous "hacking" group." Declaration of Lisa Ostella,¶ 21.	foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Inadmissible opinion testimony. FRE 701 et seq. Lack of authentication and identification of exhibit. FRE 901 et seq. Argumentative.	
22 23 24 25 26 27 28	22. "January 2011. My private information was available to all these hacker groups internationally. After Taitz started distributing our private information through the Internet	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level	Sustained: ____ Overruled: ____

1 2 3 4 5 6 7 8 9	and other third parties, Lexis searches on Liberi and myself started showing our social securities numbers as being used by multiple people. I never expected Taitz or anyone else to have access to any of my private data.” Declaration of Lisa Ostella,¶ 22.	hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	
10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	23. “I had learned form North Brunswick’s Detective Cano we had jurisdictional issues when it came to Internet crimes with different laws in different states. Judge Robreno in our civil case didn’t give us a tool Detective Cano said we needed, the TRO, and Orly Taitz had escalated her threats against me, my family, and the other Plaintiffs in our case. I felt powerless; I was scared for my safety and that of my family.” Declaration of Lisa Ostella,¶ 23.	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	Sustained: ____ Overruled: ____
25 26 27 28	24. “I had to get my family out of our North Brunswick home for their safety. Now we are in danger in our new town.”	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of	Sustained: ____ Overruled: ____

1 2 3 4 5	Declaration of Lisa Ostella,¶ 24.	declarant. FRE 601. Hearsay. FRE 802 et seq. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27	25. “We were going to move to keep my children in the same private diocese school system. But Taitz’s threatening and dangerous actions radically changed that. I couldn’t bring strangers in to see the house if we were to list it any multiple listing service, MLS. I wouldn’t know if they were Taitz followers and staking out my house since Taitz also works in real estate and has access to that service. I called investors, had my mortgage bought out within two weeks, and physically moved my family in to my husband’s uncle’s house. I had that house in North Brunswick packed up and moved in three weeks by myself due to my husband’s work schedule. I honestly didn’t	Irrelevant. FRE 401, 402. Assumes facts not in evidence, and no foundation, regarding alleged “threats” and other acts. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Lack of authentication and identification of exhibit. FRE 901 et seq. Vague and ambiguous. Argumentative.	Sustained: ____ Overruled: ____

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1 know, since Taitz had real estate 2 connections (see 3 TaitzOfficeSuites.com) if she 4 would have contacts with any 5 professional movers. I wasn't 6 risking it. What I couldn't move, 7 I left. We resided in my 8 husband's uncle's house without 9 an approved mortgage for 10 months trying to hide for our 11 safety from Orly Taitz, her 12 followers and supporters." 13 Declaration of Lisa Ostella, ¶ 25.		
14 26. "While all this was going on, 15 a woman called me on my cell 16 phone claiming to be my 17 'biological Aunt'. She said she 18 had seen a post on some 19 unnamed message forum 20 claiming to be from me, looking 21 for my biological mother and that 22 I had my cell phone posted for 23 contact. I never made any such 24 post. I especially wouldn't post 25 on a message on a forum 26 looking for information about my 27 biological family and leave my	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. Hearsay, and multiple level hearsay. FRE 802 et seq. No showing of personal knowledge of declarant. FRE 602. Inadmissible opinion testimony. FRE 701 et seq. Vague and ambiguous. Argumentative.	Sustained: ____ Overruled: ____

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	personal contact information. I knew very well the Internet is the Wild West for insanity. This woman, calling herself 'LeeAnn' said my biological mother was looking to get in touch with me and her name is 'Jane' and lives in California. I told her this 'Jane' could send me an email and I didn't want 'LeeAnn' or "Jane' to call me. I had no idea where this was coming from and I didn't want to go down this rabbit hole. Declaration of Lisa Ostella,¶ 26.		
16 17 18 19 20 21 22 23 24 25 26 27	27. "During this time, I found a MySpace page while running Orly Taitz's Yahoo email in Spokeo.com (a social networking search engine). Spokeo pulled a MySpace page made with Taitz's Yahoo email where she called herself 'Jane'. She listed her age as 18 and had MySpace friends that looked like a bunch of young girls." Declaration of Lisa Ostella,¶ 27.	Irrelevant. FRE 401, 402. Lacks foundation. Lack of identification of documents referred to. FRE 901 et seq. Hearsay, and multiple level hearsay. FRE 802 et seq. No showing of personal knowledge of declarant. FRE 602. Vague and ambiguous. Argumentative.	Sustained: ____ Overruled: ____

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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	28. “Also, during this time period, Orly Taitz posted that my attorney’s assistant, Lisa Liberi, was born in Washington State, her father’s name and her mother’s maiden name. We called the records office in Washington State to learn what information was needed to obtain a copy of a birth certificate. Washington State just needed the same primary identification information that Taitz had sent out all over the Internet. We both wondered if this is how Taitz learned I was adopted, if my ‘Jane’ was also Taitz or an associate of hers.” Declaration of Lisa Ostella,¶ 28.	Irrelevant. FRE 401, 402. Hearsay, and multiple level hearsay. FRE 802 et seq. Assumes facts in evidence and no foundation regarding alleged “post.” Lacks foundation. Speculation. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	Sustained: ____ Overruled: ____
20 21 22 23 24 25 26 27	29. “The day we began residing at my husband’s uncle’s house, I received an email from ‘Jane’. She said she was watching our moving day on Google Satellite. Normal Google Satellite doesn’t allow for live time viewing. However, Orly Taitz’s husband’s	Irrelevant. FRE 401, 402. Hearsay, and multiple level hearsay. FRE 802 et seq. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Lack of identification of	Sustained: ____ Overruled: ____

1 2 3 4 5 6 7 8 9 10	company, Daylight, is a U.S. Department of Defense Contractor. I have no idea what access they have to live satellite feeds. Now I didn't know what to think or what to do. I made this move, fast and as quietly as possible in order to protect my family." Declaration of Lisa Ostella,¶ 29.	documents referred to. FRE 901 et seq. Argumentative.	
11 12 13 14 15 16 17 18 19 20 21 22 23	30. "When we filed suit, my attorney recommended that I use a P.O. Box number to mask my personal account information. I obtained a post office box in the town I moved out of, North Brunswick, to help mask my move. That didn't fool Orly Taitz. Taitz posted all over her blog that the P.O. Box was only sued as my business address. So that didn't work." Declaration of Lisa Ostella,¶ 30.	Irrelevant. FRE 401, 402. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Assumes facts not in evidence, and no foundation regarding alleged "posts." Argumentative.	Sustained: ____ Overruled: ____
24 25 26 27 28	31. "Months later, our mortgage came through and now we had to make my husband's uncle's house our legal address. I put as much of the utility and contact	Irrelevant. FRE 401, 402. Vague and ambiguous. Lacks foundation. Speculation. No showing of personal knowledge of	Sustained: ____ Overruled: ____

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	information under our P.O. Box as I could; New Jersey has stricter laws than most states in using P.O. Boxes as contact information. A few days after the deed was filed in the state records, I ran our information in search engines. The deed record came up cached in a Google search page. That record information is entered in a database. The record was cached in a html page. In order for that to happen that record would have had to been pulled several times for Google to cache it as an html (web page) page. That means someone ran our information several times and pulled that information to make it display as a webpage in order to get it cached in a Google search engine.” Declaration of Lisa Ostella,¶ 31.	declarant. FRE 602. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence and no foundation regarding alleged “cache.” Argumentative.	
25 26 27 28	32. “Nine days after this record was publicly accessible, my children’s rabbits were gutted.	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. Hearsay. FRE	Sustained: ____ Overruled: ____

The carcasses were nowhere to be found; but the inerts were intact and laid out at the foot our deck right where one would step off our deck. Animal Control set up a motion camera in my yard right where their coops were kept. If it was an animal that did this, they would be back to the same spot within a few days if we left the smells (hay and bedding) there. That camera was up for two weeks. No animal came into our yard and approached the coops looking for the rabbits. Wild animals will tear apart their meals and or carry them off and bury them. Not lay out and display the inerts. We reside in a private upper class community. The neighborhood and area we reside has a very low crime rate. Most of the people here didn't even know we had rabbits; we were still too new to the

802 et seq. No showing of personal knowledge of declarant. FRE 602. Vague and ambiguous.
Inadmissible opinion testimony. FRE 701 et seq.
Argumentative.

1 2	neighborhood.” Declaration of Lisa Ostella,¶ 32.		
3 4 5 6 7 8 9 10 11 12 13	33. “Now I learned I had a new problem. Our move changed our jurisdiction. Even though I had my reports I had made with North Brunswick transferred, my new town can’t prosecute anything that happened in North Brunswick. Yes, the events were on record, but we had to start all over again.” Declaration of Lisa Ostella,¶ 33.	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. Vague and ambiguous. Hearsay. FRE 802 et seq. No showing of personal knowledge of declarant. FRE 602. Argumentative.	Sustained: ____ Overruled: ____
14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	34. “Shortly after my rabbits were killed, I agreed to lend testimony to Charles Lincoln, referred to as Lincoln from here on, in a case he was being falsely accused of crimes by Orly Taitz, <u>U.S. Bank v. Riverneider</u> , U.S. District Court, Southern District of Florida, Case No. 9:09-cv- 81255-WPD. I had learned from my attorney, who was representing Lincoln that he had information from me and would provide me with an affidavit.” Declaration of Lisa Ostella,¶ 34.	Irrelevant. FRE 401, 402. Hearsay, and multiple level hearsay. FRE 802 et seq. Lacks foundation. Speculation. Vague and ambiguous. No showing of personal knowledge of declarant. FRE 602. Argumentative.	Sustained: ____ Overruled: ____

1 2 3 4 5 6 7 8	35. "It turned out that Lincoln drove Orly Taitz around New Jersey after a hearing in our case in Pennsylvania. The areas they drove around were that of my children's school and where we resided." Declaration of Lisa Ostella,¶ 35.	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay. FRE 802 et seq. Vague and ambiguous. Argumentative.	Sustained: ____ Overruled: ____
9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27	36. "The testimony Lincoln had needed from me for his <u>Riverneider</u> Case was in regards to when I was her assistant. Orly Taitz had me sign documents for her, which was pertinent to his case, as Orly Taitz was falsely accusing Lincoln of forging her name. Lincoln had become Taitz assistant after I had kicked her off of y website. I was shocked , horrified and scared when I saw Lincoln's affidavit. During the time when I had received information that Orly Taitz was going to have my children professionally kidnapped, she had come here to New Jersey. Lincoln had driven her to eh	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence and lacks foundation, regarding alleged "accus[at]ions]" and threats and other acts. Argumentative.	Sustained: ____ Overruled: ____

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1 2 3 4 5 6 7 8	locations she (Taitz) had instructed. He drove her past my children's school, my home, and to the North Brunswick Police Department. I know this because of the roads Lincoln stated he was on and the paths taken. Declaration of Lisa Ostella, ¶ 36.		
9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27	37. A few months after I received Lincoln's affidavit, I was running my children's emails in Spokeo.com and for the first time a picture of my daughter came up. An account was opened for y daughter at Slide.com with her Yahoo email. A picture (blurred) of her was there, standing outside her school waiting for me to pick her up. That picture would have been taken during the time Orly Taitz and Lincoln drove by because of my daughter's hairstyle. My daughter always had long hair and had it cut the first time in her life late May 2009 (Taitz and Lincoln were driving around my	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	Sustained: ____ Overruled: ____

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1 2 3 4 5 6 7 8 9 10	children's school and our residence on or about June 25, 2009). The picture was uploaded to the Slide.com account as a slide show; but this was the only picture left on the account so I couldn't see what other pictures were used to create the slide show. Declaration of Lisa Ostella, ¶ 37.		
11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27	38. "Between my Attorney's office and the Denville Police, I finally got the account down and closed. I gave the Denville police the affidavit of Charles Lincoln about Orly Taitz and their drive by. But again, jurisdictional issues became a problem. The drive by occurred in North Brunswick. They made a contact with the FBI and started forwarding all the information. The Denville Police said if our Judge would issue a TRO, it would give them more tools to work with. I took steps after this to make a few changes in my	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	Sustained: ____ Overruled: ____

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1 children's appearance.		
2 Thankfully, many of these		
3 officers I was working with are		
4 also the resource officers at their		
5 schools. I did not know what		
6 else to do." Declaration of Lisa		
7 Ostella,¶ 38.		
8 39. "Orly Taitz of course,	Irrelevant. FRE 401, 402.	Sustained: ____
9 during all of these times,	Lacks foundation.	Overruled: ____
10 continued to issue lies and	Speculation. No showing of	
11 threats about us online. She	personal knowledge of	
12 continues to create sites and	declarant. FRE 602.	
13 reissue old as well as	Hearsay, and multiple level	
14 new posts with false accusations	hearsay. FRE 802 et seq.	
15 about me and my 'crimes' and	Vague and ambiguous.	
16 false accusations about Lisa	Inadmissible opinion	
17 Liberi and Mr. Berg."	testimony. FRE 701 et seq.	
18 Declaration of Lisa Ostella,¶ 39.	Assumes facts not in	
19	evidence and lacks	
20	foundation, regarding	
21	alleged "lies and threats"	
22	and other acts.	
23	Argumentative.	
24 40. "My daughter's birthday was	Irrelevant. FRE 401, 402.	Sustained: ____
25 coing up and we were planning	Lacks foundation.	Overruled: ____
26 the event. I started receiving	Speculation. No showing of	
27 posts that were awaiting	personal knowledge of	
28 moderation in the DefendOur	declarant. FRE 602.	

1 Freedoms blog. The Ips were
2 coming from a server out of the
3 Russian Federation. They were
4 comments about my daughter's
5 birthday and to buy online drugs
6 from them for a present. Why
7 would anyone posting from a
8 Russian Federation Server know
9 I had a daughter, let alone that
10 her birthday was coming up??!!
11 A few weeks after this post, I
12 received a card in the mail from
13 this woman from California,
14 'Jane' saying she was going to be
15 in my state during the weekend
16 of my daughter's birthday and
17 she wanted to come by and see
18 my daughter. 'Jane' claimed she
19 had just moved and her old
20 contact information would no
21 longer work. So now this woman
22 claims she was going to be here.
23 This scared me so much that I
24 hired a police officer to guard my
25 daughter's party and protect my
26 family. It must have worked
27 because two days after the party,

Hearsay, and multiple level
hearsay. FRE 802 et seq.
Vague and ambiguous.
Inadmissible opinion
testimony. FRE 701 et seq.
Lack of identification of
documents referred to. FRE
901 et seq. Argumentative.

<p>1 some random unnamed person on 2 one of the forums that follows 3 every breathe that Orly Taitz 4 takes, posted an out of the 5 ordinary story about his daughter 6 having a birthday (at a zoo) and 7 there were police all around. I 8 am glad I took measure to have 9 the police there.” Declaration of 10 Lisa Ostella,¶ 40.</p>		
<p>11 41. “As demonstrated by the 12 Exhibits on file with this Court, 13 see Exhibits “1” through “145” 14 filed May 20, 2011, docket 15 number 190 through 190-27, all 16 of Orly Taitz’s emails, with the 17 false and damaging information 18 she sent regarding me and Lisa 19 Liberi, were signed DDS as well 20 as Esq. with the addresses and 21 contact information to her dental 22 offices: Orly Taitz DDS Esq, 23 26302 La Paz ste 211, Mission 24 Viejo Ca 92691. 29839 S. 25 Margarita Pkwy, Rancho Santa 26 Margarita Ca 92688. Ph. W-949- 27 586-8110. C-949-683-5411. Fax</p>	<p>Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Lack of identification and authentication of documents referred to. FRE 901 et seq. Argumentative.</p>	<p>Sustained: ____ Overruled: ____</p>

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<p>949-586-2082. Anyone that didn't want to use PayPal were to mail checks of donations to her dental office. DOFF is listed with a business address to her dental office. A whois on OrlyTaitzEsq.com that Taitz uses for DOFF is: Registrant: Orly Taitz Esquire, 26302 Lapaz Suite 211 Mission Viejo, CA 92691 US. Domain name: ORLYTAITZESQ.COM. Administrative Contact, Technical Contact: Orly Taitz Esquire http://www.domaintools.com/research/reverse-whois/?email=b4881eb33c430f573f2d563f76ea54fa. 26302 Lapaz Suite 211 Mission Viejo, CA 92691 US. 949-683-5411. Record expires on 17-Apr-2015. Record created on 17-Apr-</p>		
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2009.” Declaration of Lisa Ostella,¶ 41.		
42. “Orly Taitz has her Defend Our Freedoms Foundations, Inc. blog registered to her dental office as well as using her dental office to receive communications regarding her posts on her blog and monies.” Declaration of Lisa Ostella,¶ 42.	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	Sustained: ____ Overruled: ____
43. “I live in fear every day for myself, my children and husband. Because of the continued threatening, harassing and damaging actions of Orly Taitz. Due to the acts of Orly Taitz I have suffered and continue suffering from severe, substantial emotional distress.” Declaration of Lisa Ostella,¶ 43.	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence and lacks foundation, regarding alleged “actions” and “acts.” Argumentative.	Sustained: ____ Overruled: ____

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C. *Objections to Declaration of Charles Edward Lincoln, III*

EVIDENTIARY OBJECTIONS

DECLARATION OF PLAINTIFF, LISA LIBERI	MOVING DEFENDANT'S OBJECTIONS	COURT'S RULING
1. "I began working for and with Orly Taitz ["Orly"] in or about late May/Early June 2009. Although I was hired initially for simple legal research and drafting, in effect as Orly's Law Clerk & Personal Assistant, our relationship rapidly became much more complex, and in effect we became partners, or at least tried to implement a partnership or partnerships of several characters, of both the business and personal variety." Declaration of Charles Edward Lincoln, ¶ 1.	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	Sustained: ____ Overruled: ____
2. "I received my Ph.D. degree in 1990 from the Graduate School of Arts & Sciences at Harvard University, Cambridge, Massachusetts 02138, my dissertation's short title being "Ethnicity and Social	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay. FRE 802 et seq. Vague and ambiguous.	Sustained: ____ Overruled: ____

1 2 3 4 5	Organization” and I also received a Juris Doctor (“J.D.”) from the Law School of the University of Chicago in 1992.” Declaration of Charles Edward Lincoln, ¶ 2.	Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	
6 7 8 9 10 11 12 13 14 15 16 17 18	3. “I served as judicial extern for the Honorable Stephen Reinhardt of the United States Court of Appeals for the Ninth Circuit in 1987-88 and as a judicial law clerk for the Honorable Kenneth L. Ryskamp of the United States District Court for the Southern District of Florida where I was hired in 1991 and completed my term in September 1993.” Declaration of Charles Edward Lincoln, ¶ 3.	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	Sustained: ____ Overruled: ____
19 20 21 22 23 24 25 26 27 28	4. “I passed the Bar Exams in California, Florida, and Texas in 1992-1994, maintained offices in the States of Durango and Yucatan in Mexico as well as in Louisiana and Texas, until 2000 when I resigned in Texas as a result of an indictment in Texas, as a “plea bargain” condition of having 4/5 charges dropped and	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq.	Sustained: ____ Overruled: ____

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	<p>serving neither a single day of incarceration nor paying any significant fine or having any substantial restrictions on my liberty during a three year period of probation, during which I was allowed to travel internationally to Europe and Africa, and even to maintain lawsuits and collect settlements on my own. I remained licensed and active in California and Florida until 2002-2003, when those states imposed “reciprocal discipline” on me—requiring disbarment as the equivalent of “resignation in lieu” effected by the plea bargain in Texas.” Declaration of Charles Edward Lincoln, ¶ 4.</p>	<p>Argumentative.</p>	
20 21 22 23 24 25 26 27 28	<p>5. “Orly Taitz and I met and started working through a mutual friend, Dr. Kathy Ann Garcia-Lawson, at a time (end of May 2009) when Orly was seeking legal assistance with her litigation, including this present case (Lisa Liberi, Lisa Ostella,</p>	<p>Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion</p>	<p>Sustained: ____ Overruled: ____</p>

1 2 3 4	and Philip J. Berg) against her and Defend our Freedoms Foundation (DoFF).” Declaration of Charles Edward Lincoln, ¶ 5.	testimony. FRE 701 et seq. Argumentative.	
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	6. “Orly Taitz told me that she did not have any accounts, nor any other prior access, either personally or through her law office, at or around the time we met and throughout the five months we were working together with any of the LexisNexis defendants in this case, Reed-Elsevier, ChoicePoint, Inc. and/or Intelius, Inc. I had used LexisNexis and Intelius before, and had active subscriptions, but Orly had absolutely no online legal research tools at all, nor did she know how to use any of them.” Declaration of Charles Edward Lincoln, ¶ 6.	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	Sustained: ____ Overruled: ____
24 25 26 27 28	7. “I read with great interest Orly Taitz’ Motion to Dismiss file in this case on behalf of her corporation, Defend our Freedoms Foundations, Inc.,	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602.	Sustained: ____ Overruled: ____

1 2 3 4 5 6 7 8 9 10 11	[DOFF"] in which Orly appears to admit, carte blanche, to all of plaintiffs' allegations in this case against her (Orly), her Corporations, her husband, his Corporation, Daylight Chemical Information Systems, Inc. ("Daylight"), Oracle, all the Lexis Defendants and Intelius, Inc." Declaration of Charles Edward Lincoln, ¶ 7.	Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	
12 13 14 15 16 17 18 19 20 21 22 23 24	8. "Even more interestingly, Orly Taitz appears to admit without qualification to having obtained the information and the publication thereof directly from the LexisNexis defendants, ChoicePoint, Inc. and Intelius, Inc., (viz. Orly's Motion to Dismiss file on behalf of DOFF, Docket No. 283, filed July 11, 2011 at pages 17 through 19." Declaration of Charles Edward Lincoln, ¶ 8.	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	Sustained: ____ Overruled: ____
25 26 27 28	9. "I read Plaintiffs' original complaint in this case, as I worked against it for Orly while the case was pending before	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of	Sustained: ____ Overruled: ____

<p>1 Judge Robreno in the Eastern 2 District of Pennsylvania. Even 3 though Orly and I no longer work 4 together after she terminated both 5 our professional collaboration 6 and personal relationships, and 7 attacked me viciously on-line and 8 in the Courts I might add, 9 apparently to cover up some 10 embarrassment or shame she 11 might have felt regarding our 12 relationship, I am still following 13 this case and have read plaintiffs 14 First Amended Complaint 15 ["FAC"].” Declaration of Charles 16 Edward Lincoln, ¶ 9.</p>	<p>declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.</p>	
<p>17 10. “Orly’s apparently unlimited 18 admissions to obtaining 19 Plaintiffs’, Lisa Liberi and Lisa 20 Ostella’s private information 21 from LexisNexis, ChoicePoint, 22 Inc., and Intelius, Inc., in my 23 professional opinion, also 24 implicate and substantiate 25 plaintiffs’ claims against 26 defendants, Orly’s husband, 27 Yosef Taitz, Daylight Chemical</p>	<p>Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.</p>	<p>Sustained: ____ Overruled: ____</p>

1 2 3	Information Systems, and Oracle.” Declaration of Charles Edward Lincoln, ¶ 10.		
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	11. “As noted above, I knew at all relevant times between late May 2009 and November 2009 from personal experience with Orly nationwide and at both her offices in Orange County that, for a fact, Orly Taitz did not have accounts with the defendants Lexis Nexis companies; ChoicePoint, Inc. or Intelius. She told me repeatedly that she did not have access to these services, and I gave her my LexisNexis identity and passcode—but my subscription was limited and did not contain access to any credit or personal finance information.” Declaration of Charles Edward Lincoln, ¶ 11.	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	Sustained: ____ Overruled: ____
24 25 26 27 28	12. “The only way Orly could have obtained Plaintiffs information from the LexisNexis defendants and defendant Intelius, Inc., as she admits in	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602.	Sustained: ____ Overruled: ____

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DOFF's Motion to Dismiss, would have been through her husband, Defendant Yosef Taitz, and specifically through Yosef Taitz's company defendant Daylight and defendant Oracle, Inc. as outlined in the plaintiffs FAC. Orly told me repeatedly that she did in fact receive substantial information from her husband, as well as a great deal of money (including all the money "we" had to live and travel on...although I only learned that she effectively had no money of her own at the dead end of our relationship in late October/early November 2009) and that was why she was unwilling to leave him, although she described him as cold, cruel, both physically and emotionally abusive, and completely disinterested in her from a romantic and personal standpoint." Declaration of Charles Edward Lincoln, ¶ 12.

Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.

1 2 3 4 5 6 7 8 9 10 11	13. "Orly also admits in her Motion to Dismiss filed on behalf of DOFF that she also obtained information from Neil Sankey, a defendant in this case. Orly showed me and asked me to evaluate, and so I actually saw the background searches, submitted to Orly from Mr. Sankey." Declaration of Charles Edward Lincoln, ¶ 13.	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	Sustained: ____ Overruled: ____
12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27	14. "Orly explained to me and showed me in the documentation that Mr. Sankey obtained all this information fro his son, Todd Sankey and his company, the Sankey Firm, Inc.'s accounts with the defendants LexisNexis, ChoicePoint, Inc. and Intelius. She regarded them as close and trusted allies, and she knew that I was unable, due to my subscription limitations, to provide equivalent information or recheck the accuracy of what she was provided by these sources (her Husband's and	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	Sustained: ____ Overruled: ____

28

1	Sankey's corporations)."		
2	Declaration of Charles Edward		
3	Lincoln, ¶ 14.		
4	15. "As much as I cared about	Irrelevant. FRE 401, 402.	Sustained: ____
5	her and found her among the	Lacks foundation.	Overruled: ____
6	most fascinating and surely the	Speculation. No showing of	
7	most complex women I have ever	personal knowledge of	
8	known, it seemed extremely odd	declarant. FRE 602.	
9	to me that Orly, who is a licensed	Hearsay, and multiple level	
10	attorney, engaged in some of the	hearsay. FRE 802 et seq.	
11	most complex and potentially	Vague and ambiguous.	
12	politically and historically	Inadmissible opinion	
13	significant litigation I have	testimony. FRE 701 et seq.	
14	known about, did not know how	Argumentative.	
15	to conduct any type of research,		
16	including but not limited to on-		
17	line legal research for purposes		
18	of preparing any sort of argument		
19	or even the most rudimentary		
20	legal brief. It sometimes seemed		
21	as if Orly has never really been to		
22	Law School, really, and was hard		
23	to believe that she ever passed		
24	the California bar—which is		
25	reputed to be the most difficult in		
26	the United States (except for the		
27	unusual civil law of Louisiana)."		

1	Declaration of Charles Edward		
2	Lincoln, ¶ 15.		
3	16. “Orly continued asking her	Irrelevant. FRE 401, 402.	Sustained: ____
4	supporters and legal colleagues	Lacks foundation.	Overruled: ____
5	for help in research for her legal	Speculation. No showing of	
6	briefs, but (at least from what she	personal knowledge of	
7	told me, prior to and during the	declarant. FRE 602.	
8	time I worked with her) none of	Hearsay, and multiple level	
9	her supporters helped her out in	hearsay. FRE 802 et seq.	
10	this way. Although at the time I	Vague and ambiguous.	
11	believed that Orly showed more	Inadmissible opinion	
12	determination, grit, and courage	testimony. FRE 701 et seq.	
13	than any woman I had ever	Argumentative.	
14	known, it was almost as if she		
15	barely knew anything about the		
16	law or how to do any sort of		
17	research at all. She latched on to		
18	certain ideas and insisted on		
19	following through with them.		
20	She was particularly interested in		
21	all those ideas which would draw		
22	attention to her and elicit		
23	enthusiasm or support from her		
24	“followers”—although I told her		
25	that “legal research by political		
26	lay committee” was an extremely		
27	bad idea—even if the lay		
28			

1 2 3 4 5	committee was compsed of “patriots” who claimed to understand the law better than anyone else.” Declaration of Charles Edward Lincoln, ¶ 16.		
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	17. “Again as noted above, I had a Lexis account, which was limited to basic state and federal (and Canadian/Mexican) legal research, case searches, “Shepard’s© Citations,” law reviews, some other secondary sources, pleadings, motions and briefs. I did not have the type of account with Lexis that allowed background searches, social security numbers searches or any type of private data. I did not have a ChoicePoint, Inc. or Seisint, Inc. account, but I did have a limited access Intelius Account for limited personal data searches.” Declaration of Charles Edward Lincoln, ¶ 17.	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	Sustained: ____ Overruled: ____
25 26 27 28	18. “In the time I worked with Orly and was with her, and we spent a great deal of time together, both at her offices and	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of	Sustained: ____ Overruled: ____

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	<p>wherever I was staying (at my former house in Rancho Santa Margarita or at hotels) I do not recall ever seeing Orly even attempt to do research on her own. She would often tell me what her supporters had told her, what her husband had provided for her, or what Sankey or other researchers (there were several other whose names I do not presently recall) had provided for her. Nor, did Orly ever direct me on what legal searches she required for her legal briefs—I was constantly telling her where we should go, and she would make the decision about how to emphasize or highlight issues depending on what I would sometimes tease her by calling their “commercial appeal.””</p> <p>Declaration of Charles Edward Lincoln, ¶ 18.</p>	<p>declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.</p>	
25 26 27 28	<p>19. “It may sound harsh, but I am not sure Orly understood even the most basic principles of</p>	<p>Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of</p>	<p>Sustained: ____ Overruled: ____</p>

1 legal research such as evaluating
2 precedent or stare decisis,
3 distinguishing controlling
4 “holdings” from dicta, or the
5 proper application of “most
6 recent controlling precedent
7 within jurisdiction” analysis, the
8 importance of Shepardizing cases
9 or doing “case citation” histories.
10 She certainly had no real idea
11 how to properly format a case
12 citation or what lists of cases in a
13 Shepard’s© Citation page meant
14 (admittedly, those pages look
15 pretty mysterious until one learns
16 how to interpret them, but most
17 people get past this mystery by
18 the second month in law school
19 at the latest).” Declaration of
20 Charles Edward Lincoln, ¶ 19.

personal knowledge of
declarant. FRE 602.
Hearsay, and multiple level
hearsay. FRE 802 et seq.
Vague and ambiguous.
Inadmissible opinion
testimony. FRE 701 et seq.
Argumentative.

22 **III. CONCLUSION**

23 For the reasons stated herein, the declarations submitted by Plaintiffs and
24 their accompanying exhibits cannot be considered in opposition to Moving
25 Defendant’s subject Motion. If such declarations are considered by this Court,
26 Moving Defendant respectfully requests that her evidentiary objections to the

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1 declarations be sustained in their entirety, and that such declarations and their
2 accompanying exhibits not be considered for any purpose.

3
4 DATED: August 8, 2011

SCHUMANN, RALLO & ROSENBERG, LLP

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9 Peter Cook Esq.
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